



February 8, 2016

The Town of Winchester
Zoning Board of Appeal
71 Mount Vernon Street
Winchester, MA

Subject: Petition No. 3738 by FX Winchester, LLC concerning property at 416 Cambridge Street

Dear Members of the Zoning Board of Appeals,

We write to you with regard to the above referenced petition associated with proposed plans to construct 95 housing units on approximately 2.5 acres at 416 Cambridge St. Our organization has concern that the project, as it is currently proposed, may cause impairment of environmental conditions in the Upper Mystic Lake by adding to the number of sanitary sewer overflows in the project vicinity.

Sanitary sewer overflows are unpermitted overflows that result from the failure of local sewer and stormwater infrastructure integrity and expose recreational users of nearby water bodies to dangerous bacteria, viruses and parasites.

The Mystic River Watershed Association has consistently advocated for the elimination of sanitary sewer overflows and promoted restoration and repair of the local sewer and stormwater systems as well as the use of green infrastructure to address this problem.

MyRWA Mission

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.

Concerns with the Project at 416 Cambridge Street

MyRWA has a history of successful collaboration on developments that benefit the community and contribute to the health of the watershed. Our organization recognizes the need to create affordable housing in Mystic River communities. However, we raise concern that the housing project proposed at 416 Cambridge Street (Winchester North) may add to existing problems in the Everett Street (SB67 - SB66) sewer segment and as a result degrade ecological and hydrologic values of the Upper Mystic Lake.

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The Mystic Lakes are an environmental treasure that enjoy consistently good water quality. These conditions were recently highlighted by the grade issued by the US EPA for Mystic River water quality in 2015. This grade, based upon water quality data collected and compiled by Mystic River Watershed Association staff and volunteers, indicates that many years of work and millions of dollars spent to address pollution sources in the Mystic River watershed have produced good results for the Mystic Lakes. For 2015, the grade for water quality in upper Mystic Lake was listed as A+, that is, meeting water quality standards for boating and swimming 96% of the time.

In our opinion, given the proposed project's high density, it is essential to confirm that the project does not increase the number or size of SSOs in the Edgewater Place/Everett Ave. area and care be taken to ensure that the project will not negatively impact Upper Mystic Lake water quality.

We support the recommendations outlined by Tetra Tech in a letter to the Winchester Board of Appeals dated January 19, 2016 requesting that:

"... the Zoning Board of Appeal require the applicant to perform additional evaluation of downstream wastewater infrastructure including the collection and incorporation of current flow metering data for any section of downstream infrastructure showing evidence of surcharge or with a history of capacity concerns under any conditions, including wet weather."

This further evaluation will provide additional and important information about the capacity of the Winchester Sewer System and will help determine what measures are appropriate to request as a condition to issuance of a sewer permit for the project in question. This evaluation will also provide valuable data with regard to existing and prospective impact to and impairment of the Mystic Lakes. Thank you for your kind consideration. If you have any questions or require additional information please feel free to contact us.

On behalf of the Mystic River Watershed Association,



EkOngKar Singh Khalsa, Executive Director



Tracy Olson, Mystic River Policy Committee Chair

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