Charles River Watershed Association

Ian A. Bowles, Secretary
Executive Office of Environmental Affairs
MEPA Unit
251 Causeway Street, Suite 900
Boston, MA 02114

Attn: Nicholas Zavolas

Re: Environmental Notification Form (ENF), Prospect Point, EOEA # 13952

Dear Secretary Bowles:

Charles River Watershed Association (CRWA) is a leading science and advocacy organization dedicated to the protection, preservation and enhancement of the Charles River and its watershed and appreciates the opportunity to comment on the above referenced ENF.

According to the ENF, this project meets or exceeds the mandatory Environmental Impact Report (EIR) threshold based on its impacts to land and transportation, but not water resources. In this case, proposed land alterations could have direct, negative impacts to the draining waterbodies. Impervious area compromises water quality by increasing peak flows of contaminated runoff while reducing groundwater recharge. With the proposed addition of 27 acres of impervious area and the site draining to both an Outstanding Resource Water and a Category 5 waterbody, threats to the Stony Brook Reservoir and the Charles River are real and need to be comprehensively addressed in the draft EIR.

The ENF states that a "significant portion" of the site is tributary to the Stony Brook Reservoir, characterized as an Outstanding Resource Water under the Massachusetts Surface Water Quality Standards of 1995 and drinking water supply for the City of Cambridge. The tributary draining much of the project site (WA-17) is a high risk tributary threatening the Reservoir's water quality due to cumulative impacts from high density development within its watershed. The draft EIR should contain a detailed stormwater management plan, complete with drainage maps, delineation of all drainage areas, results from stormwater models estimating expected water quality and quantity from the site, probable impacts to critical resource areas, and effectiveness of proposed mitigation. The draft EIR should also include a stormwater cumulative impacts analysis, assessing the project's relative contribution to water quality, in light of WA-17 draining

other high density neighboring developments including the Green Street Development, EOEA #1307. The proponent should work closely with the City of Cambridge Water Department to identify priority stormwater pollutants, assess existing stormwater controls, develop effective mitigation strategies and develop a long-term operation and maintenance plan to insure future success of stormwater controls.

The Charles River and its lakes region in Waltham is a valuable recreational resource, heavily trafficked by boaters and game fishermen. According to the 1997/1998 Massachusetts DEP Water Quality Assessment Report and water quality data collected by CRWA, this segment of the Charles (MA72-07) does not meet designated use standards for primary and secondary contact due to high bacteria levels, aquatic life due to low oxygen levels, and aesthetics from nutrient enrichment encouraging the growth of non-native, invasive plants.

Without the proper stormwater controls, runoff from the project site could increase loadings of bacteria and nutrients, encouraging continued impairment, eutrophication, and threaten the local, water-based economy. CRWA would like the proponent to include in its stormwater management plan proper mitigation for runoff entering the Charles to the same high level of detail as its stormwater assessment for WA-17.

CRWA believes that redevelopment in urban environments is the perfect opportunity to recreate pre-development hydrology. By keeping water local, i.e. filtering and recharging stormwater on-site using a suite of Best Management Practices (BMP) and Low Impact Development (LID) techniques and capturing stormwater for irrigation and other non-potable uses, one can increase water quality, recharge aquifers and reduce water demand. LID technologies publicly demonstrate a long anticipated paradigm shift in how stormwater should be properly managed and can be a powerful and effective promotional platform for the developer and partnering engineering firms. We are encouraged that LID will be considered within the proposed stormwater management plan and urge the developer to weigh the benefits of LID higher in feasibility and cost/benefit analyses because of the sensitivity of the draining water bodies and abutting wetland resource areas. CRWA would also like the draft EIR to assess alternative build scenarios that reduce building footprints, include tiered parking to reduce impervious surface area, and pervious pavements to promote local recharge.

The project claims a reduction in existing conditions for both water and sewer demand. Consequently, the proponent needs to work closely with Massachusetts Water Resources Authority (MWRA) and the City of Waltham to assess the need to participate its ongoing infiltration and inflow (I/I) removal programs. Water conservation strategies should be analyzed and proposed in the draft EIR to reduce demand on MWRA water, especially for irrigation.

CRWA would like the draft EIR to include a comprehensive Transportation Demand Management (TDM) Plan, similar in scope to that proposed by the 40 Green Street project (EOEA #1307) to help assuage traffic, reduce vehicle trips/day and reduce exhaust emissions by planning for public transit, walking and biking.

Please feel free to contact me with any questions (781) 788-0007 x224 or at dkaplan@crwa.org.

Sincerely,

David Kaplan
Water Resources Specialist
Charles River Watershed Association

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