



## Charles River Watershed Association

March 14, 2008

Janet Bowser, Executive Director  
Wellesley Natural Resources Commission  
525 Washington Street  
Wellesley, MA 02482

RE: 27 Washington Street Redevelopment

Dear Ms. Bowser:

Charles River Watershed Association (CRWA) has reviewed the Notice of Intent and Local Waiver Request submitted to your office by National Development for the proposed redevelopment of the former Grossman's site in Lower Falls. We are especially interested in the redevelopment of this site as it sits in a prominent location, directly on the Charles River, in a location of the river with good water quality, and unusually good habitat characteristics. Furthermore, the site offers the opportunity to help build meaningful visual and pedestrian connections between the busy urban setting of the Lower Falls neighborhood and the riverfront, maximizing the tremendous natural resource opportunity the river brings to the neighborhood.

We are pleased to see a new proposal to redevelop this site, which, in its current condition causes significant runoff and stormwater pollutant loadings. A redevelopment offers the opportunity to reduce these impacts, improve degraded bank conditions and improve public access to the river. Based on our review of the filing, and following discussions with National Development, we offer the following suggestions for further site plan improvements.

### Riverfront Area

The current plan provides significant improvements to the Bank and Riverfront Area, including the removal of the existing fence, bank stabilization, outfall improvements, the removal of invasive species, the overall expansion of the vegetated area, the removal of impervious cover, and development of a public pathway along the river. Conditions in Wellesley's No Disturbance and Limited Disturbance Zones would be improved.

We suggest, however, that the building footprints, residential amenities and parking areas can and should be modified to eliminate impervious cover altogether in the 100 foot Riverfront Area and to make overall design improvements more in keeping with the site's natural resources. Site redesign might require the considerations of alternative building massing, with certain buildings, or portions of buildings higher than currently proposed. We urge the Commission to work with national Development and the neighbors to evaluate the feasibility of pulling the buildings

further from the river, and to consider all options, including alternative building heights, to determine whether this is possible.

We also suggest that a swimming pool is not an appropriate amenity in this area and urge National Development to consider relocating or simply removing the pool. This area can and should be designed and landscaped so the trafficked residential areas blend gradually into the more naturalistic setting of the riverfront. It seems unlikely to us that a swimming pool would provide nearly as useful or valuable an amenity to residents as other amenities that might be more appropriate to this area, such as terraced patio areas, gardens, small ponds, or wetland areas. It may be possible to integrate some stormwater management into such as design as well, using vegetated BMPs to augment the proposed underground infiltration system. We strongly encourage a more creative landscape design for the residential courtyard area.

### Stormwater management

We urge the Commission and National Development to consider the use of permeable material (such as porous asphalt, or one of a variety of porous pavers) for the parking areas, perhaps including the travel lanes, throughout the site where underground parking or utilities do not preclude it. The site appears to have permeable soils (generally type A), and would be able to infiltrate significant rainstorm events. Porous pavement, which is increasingly being used in New England's cold climate, provides decentralized stormwater management and reduces the need for stormwater infrastructure. Other benefits include better snow and ice management, and reduced thermal loads to the river. The added per square foot cost of installing porous materials may be offset by the ability to install fewer catch basins and less storm drain pipe. A porous asphalt parking lot in Waltham was permitted recently which allowed for significantly less storm drain infrastructure than a conventional lot.

We strongly support the inclusion of bioretention areas and rooftop recharge, but encourage alternatives to the proposed underground particle separators. These devices, though approved by Massachusetts for the removal of TSS, are operating poorly in the field in many installations, and do little to remove critical pollutants such as phosphorus. We suggest National Development identify alternative BMPs that will achieve the 65% phosphorus reduction identified by EPA's recently approved Total maximum Daily Load Report (TMDL) for high density residential development.

### Public Access

Finally, we urge the Commission, the Wellesley Board of Selectmen, residents and area businesses to use the opportunity provided by the long-awaited redevelopment of this site to develop a much needed physical green connection to the Charles River from the busy Washington Street corridor. The former railroad easement to the east of this site, which we understand is now owned by the Town, should be developed as a green corridor or "gateway to the river," with a public pathway, trees, benches and visual cues connecting the neighborhood and street to the river. This stretch of the Charles, below the dams of Lower Falls, has good water quality and excellent riverine habitat. The newly restored riverfront at 27 Washington Street could be linked with an open space corridor, and could spur much-needed redevelopment of additional segments of riverfront in this area.

We look forward to continued progress as the site review process continues. Please feel free to contact me should you have questions.

Sincerely,

A handwritten signature in black ink that reads "Kate Bowditch". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Kate Bowditch  
Director of Projects

Cc: Representative Kay Kahn  
Massachusetts Department of Conservation and Recreation  
Wellesley Board of Selectmen  
National Development