



Charles River Watershed Association

February 10, 2009

Ian A. Bowles, Secretary
EOEA, Attn. MEPA Office
Rick Bourre, EOEA # 12565
100 Cambridge Street, Suite 900
Boston, MA 02114

***Re: Urban Ring Phase II, Revised Draft Environmental Impact Report /
Draft Environmental Impact Statement, EOEA # 12565***

Dear Secretary Bowles:

The Charles River Watershed Association (CRWA) submits the following comments on the Revised Draft Environmental Impact Report (RDEIR) for the above-referenced project. We support many of the revisions presented in this filing; we also believe the lack of planning for stormwater management at this stage of the project is a serious problem, and that the MEPA process requires that stormwater management planning be addressed.

CRWA appreciates the significant progress that has been made in assessing alternatives for the alignment of the route, the cost and scheduling issues, and the response to public comments through the ongoing review process. Several elements of the current preferred alternative appear to offer important improvements over other options, pending further environmental review. Specifically, pending more detailed analysis, we support the inclusion of the LMA tunnel as it has the potential to provide the best service in this important area with the least environmental impact, and the least impact to important historic park and parkway resources.

CRWA also agrees that the BU bridge is not a desirable Charles River crossing route for the Urban Ring, and we support the development of more details about the proposed reconfiguration of the Grand Junction Railroad Bridge, including an evaluation of both construction and permanent impacts on the water sheet of the Charles River and the Charles River Parklands, and any proposed mitigation.

We also support many of the transportation planning comments made by Fred Salvucci in his February 4, 2009 memo to Secretaries Aloisi and Bowles, especially the need to

*190 Park Road, Weston, MA 02493 phone: (781) 788-0007 fax: (781) 788-0057
url: www.charlesriver.org, email: crwa@crwa.org*

coordinate planning for the Urban Ring with Boston University bridge reconstruction project.

We agree that there is a real need for improvements to pedestrian pathways in the Charles River Parkways, and the modifications to the Grand Junction Railroad Bridge present an excellent opportunity to investigate the alternatives.

One area of the RDEIR, however, is inadequate and fails to meet the requirements of MEPA: the discussion of stormwater management. We urge you to scope the FEIR to require a significant and meaningful discussion of stormwater management design and alternatives, including infrastructure and operations and maintenance, and to require at a minimum that the project be designed to meet the requirements of any TMDLs that have been completed in any of the receiving waters into which stormwater runoff from the Urban Ring will discharge, including project areas where runoff will be discharged into existing drainage infrastructure.

Stormwater

The lack of any discussion in the RDEIR of stormwater management plans, conceptual approaches to infrastructure design, alternatives analyses, or integration with other stormwater management agencies is troubling. Indeed, the RDEIR does not even discuss stormwater impacts in its discussion of the impacts of the preferred alternative. CRWA views this as a major oversight, and we suggest that significantly more resources be devoted to considering design and management alternatives for stormwater in the FEIR.

Leaving stormwater management design decisions to the end of the design process and treating them as an end-of-the-process permitting issue will result in poor design, missed opportunities, and, perhaps, in extremely expensive retrofit requirements in order to comply with MS4 permits and to achieve the requirements of TMDLs.

Stormwater management in transportation corridors has tremendous impacts on project design, construction cost, lifecycle cost, operation and maintenance, and aesthetic factors, not to mention the major environmental impacts. Green infrastructure, Low Impact Development (LID) and innovative Best Management Practices (BMPs) are now widely used on highway and roadway projects. These designs in many cases reduce costs and increase the effectiveness of stormwater management. Of particular importance in the Charles River, conventional “gray pipe” infrastructure is very ineffective at reducing nutrient loads in stormwater. It is unlikely that infrastructure designs that rely on conventional piped infrastructure for managing stormwater will achieve the requirements of the Charles River Nutrient TMDL¹.

¹ The Total Maximum Daily Load (TMDL) for nutrients, issued in 2007 by U.S. EPA and MassDEP, documents that phosphorous loadings to the river are directly causing or contributing to the eutrophication and excessive algal blooms in the Lower Charles River. Stormwater (from both overland and piped drainage systems) is a major contributor of phosphorous loading to the river.

Decisions about the types and locations of stormwater management BMPs should be made early on in the design process, following context-sensitive design guidelines, and using integrated planning approaches. Bridge and tunnel stormwater management designs are of particular importance as they can have direct and significant impacts on groundwater, wetland resources and receiving water quality. Materials such as open course asphalt should be considered to reduce pavement ponding, splashing and erosion of vegetated areas alongside the roadways.

Major construction projects such as the Urban Ring present some of the best opportunities to redesign how stormwater is managed in urban areas. Massachusetts has recognized the need to improve water quality, stabilize groundwater levels, and reduce peak flows, flooding and erosion. Stormwater plays an important role in all of these. Regulations, permits and policies that are now in place or are under development require significantly improved stormwater management as an important element in making progress. Achieving these goals will not only improve the quality of life in urban areas but may also reduce costs in the long term. Technologies and design approaches now exist that make it feasible to design roadways in ways that can help move towards these goals. The Urban Ring presents many opportunities to develop improved stormwater management approaches, and we believe these opportunities need to be examined fully in the process leading to the development of the FEIR.

Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in cursive script, reading "Kate Bowditch", with a horizontal line underneath.

Kate Bowditch
Director of Projects