



December 12, 2019

Via Email

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Re: ENF for Hanover Wellesley, 20 & 40 William Street, Wellesley, MA

Dear Purvi:

Charles River Watershed Association (“CRWA”) submits the following comments on the Environmental Notification Form (“ENF”) for Hanover Wellesley project in Wellesley, Massachusetts filed with the MEPA Office on November 15, 2019. This project proposes to demolish an existing office building on site and construct a new residential building containing 350 units, that will include 591 garaged and 78 surface parking spaces.

While CRWA supports the creation of new affordable housing and utilization of smart growth development practices in Wellesley, this site is located in close proximity to the banks of the Charles River and adjacent to the Upper Charles River Reservation. A significant portion of the proposed building would be located within the FEMA 100-year flood zone and the 100-foot wetlands buffer. The project would also add new impervious surface and does not appear to include green infrastructure measures that would help reduce flooding and stormwater pollution.

Despite its location near the banks of the Charles, the ENF for this project does not mention climate change or include any measures that would make the project climate resilient. A GIS analysis of the Charles River watershed conducted by CRWA and The Nature Conservancy (<https://maps.coastalresilience.org/massachusetts/>) indicates that there are important conservation and restoration opportunities on this site, which are discussed below. An Environmental Impact Report (“EIR”) should be required to fully evaluate the environmental impacts of and alternatives to a project of this scope and magnitude, as well as the opportunities it presents to improve flood protection and enhance climate resilience in the area. The EIR should also include a demonstration of how the project will comply with the Charles River nutrient TMDL.

Conservation and Restoration Opportunities at this Site

CRWA's GIS analysis indicates that this site offers the following benefits on the undeveloped portions of the site:

- Water Resource Protection. This site is in an area within the watershed where there are good opportunities to recharge groundwater to support local water supply and environmental health.
- Inland Flooding Protection. This site is located in an area prone to inland flooding, where conserving intact land and processes may help alleviate flooding.

The analysis also identifies needed restoration actions on the portion of the site that is currently developed:

- Upland restoration opportunity. This site is an upland area within the watershed where restoration is needed.
- Depave/low impact development opportunity. This site contains impervious areas within a FEMA floodplain that should be removed and replaced with soft structures or natural flood protection features.

Given previous development of this site and in the surrounding area, this site presents unique opportunities to improve climate resilience and ensure protection of water resources, while providing needed housing. These opportunities should be factored into the development plans for the site and fully evaluated in an EIR.

Wetlands

The proponent asserts that the project would have only modest impact on environmental resources, but proposes to impact 36,907 square feet of Bordering Land Subject to Flooding, including adding 21,478 cubic feet of fill to these areas. The project also involves work within approximately 34,250 square feet of the 100-foot wetland buffer zone. Wetlands protect water quality and provide vital flood storage and habitat, and buffer zones are an important way to ensure that wetland resources are protected. Impacts to wetlands should be avoided where possible and minimized and mitigated where they cannot be avoided. Restoration of wetlands and buffer zones should also be prioritized, even where they are degraded as a result of previous development.

As mitigation for impacts to the Bordering Land Subject to Flooding, the project includes a proposed subsurface compensatory storage system. Although the proponent states that this storage system will result in a net increase in storage capacity over existing site conditions, this may not be adequate to handle the amounts of water we will see under future climate conditions. A significant portion of the proposed building is already located within the existing

FEMA 100-year floodplain, and FEMA floodplains are designated based on historical data. Given this site's proximity to the Charles River, it will become even more vulnerable to flooding under future climate conditions. Adding 21,478 cubic feet of fill to Bordering Land Subject to Flooding will only exacerbate flooding on this site and surrounding sites. Further analysis should be provided in an EIR to evaluate future climate conditions and ensure that this proposed development will be climate resilient without negatively affecting surrounding areas.

There is also a vernal pool nearby and the 100-foot buffer extends onto the project site. The proponent states that previously developed areas are excluded from protection as vernal pool habitat and therefore there is no such habitat on the project site. However, vernal pools are highly sensitive resources and any potential impacts to, as well as measures necessary to protect, this vernal pool should be fully evaluated in an EIR.

Impervious Surface

This 4.88-acre site is proposed to be covered almost entirely with impervious surface (the proponent is proposing to add 0.51 acres of new impervious surface for a total of 4.51 acres). Impervious surfaces exacerbate stormwater pollution and runoff and contribute to heat island effects. Creation of new impervious surfaces should be avoided and existing impervious surfaces should be removed wherever possible. CRWA acknowledges that the project incorporates some structured parking, which is far preferable to surface parking. The proponent should consider whether more can be done to reduce the amount of surface parking.

Green infrastructure must be extensively incorporated into the parking lot design and into existing parking areas to treat stormwater generated by impervious surfaces. The ENF also does not say whether the proponent has considered alternatives to impervious surfaces such as porous pavement for walkways or use of green roofs or cisterns to reduce the volume of runoff generated by the project. One of the diagrams in the ENF depicts "potential" pervious paver sidewalks and bioretention, but these are not committed to in the ENF narrative.

Given this site's proximity to the Charles River and wetlands, stormwater runoff from impervious surfaces on the site will have a significant environmental impact. More information and analysis of green infrastructure alternatives should be provided in an EIR so that the public can fully understand and evaluate the environmental impacts of impervious surfaces on this site and alternatives to them.

Stormwater

The ENF notes that the project will meet MassDEP's stormwater management regulations but does not specifically demonstrate how compliance will be achieved. There are specific requirements for development and redevelopment projects set forth in the Massachusetts MS4 General Permit that are not referenced in the ENF. Furthermore, the ENF does not refer to or detail how the project will comply with the Total Maximum Daily Load ("TMDL") for nutrients in the Upper/Middle Charles River, finalized in 2011. The ENF indicates

that structural BMPs will provide for phosphorus removal to improve water quality in the Charles River, but additional stormwater management plans detailing system sizing, type, and location should be provided in an EIR, along with calculations showing that the project complies with the TMDL, which requires no additional inputs of phosphorus to the river and a significant reduction from existing development. Additionally, according to the National Climate Assessment, the amount of precipitation falling in very heavy events increased by 71% in New England from 1958 to 2012. The ability of stormwater management systems to handle current and predicted future rainfall amounts using the best available science should be evaluated in an EIR.

As discussed above, the ENF does not indicate that stormwater management techniques will include green infrastructure measures. Above-surface green infrastructure such as tree plantings and bioswales to treat all stormwater should be detailed in an EIR. Their features should be integrated into the design along roadway buffers, parking lots, and pathways.

Trees & Vegetation

Trees and other vegetation protect air and water quality, help to control stormwater runoff and flooding, and provide natural cooling. We are glad to see that the project will include planting native trees and shrubs within proposed vegetated areas – trees should be planted on site along proposed roadways and in proposed landscaped areas wherever possible.

Wildlife Habitat

The ENF acknowledges that 310 CMR 10.57(4)(a)(3) requires work in those portions of Bordering Land Subject to Flooding found to be significant to the protection of wildlife habitat to not impair its capacity to provide important wildlife habitat functions. The proponent argues that although the project would exceed applicable thresholds, its work will not impair the capacity of the site to provide important wildlife habitat functions since the resource areas have been previously altered and degraded by development, which has effectively eliminated their ability to function as important wildlife habitat.

Given the importance of protecting and restoring habitat along the Charles River and in floodplains, further analysis should be provided in an EIR to determine the potential of this site to provide wildlife habitat and what the impacts of the project would be on such habitat.

Water Conservation

This project would result in the use of 55,983 additional gallons of water per day. While there are some water conservation measures included in the ENF, the project proponent should place a greater focus on water conservation and efficiency, particularly in the form of eliminating the use of potable water for irrigation and the use of drought resistant plants. The strain on our water resources is only increasing, and we need to prepare for increased drought in the future.

Alternatives Analysis

Although the proponent considered alternative uses for the proposed site, the ENF does not indicate that alternative configurations for the proposed project were considered. An EIR should be prepared that considers alternative configurations, particularly configurations that would 1) avoid construction within the 100-foot wetland buffer and floodplain, 2) include green infrastructure measures, 3) account for forward-looking flood and stormwater projections, and 4) enhance climate resilience in the area.

Thank you for considering these comments, and please do not hesitate to reach out with any questions.

Sincerely,



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cc: Michael Paiewonsky, AICP, Stantec
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