



April 24, 2020

*Via email*

Anne Canaday  
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**Re: Expanded Environmental Notification Form for CambridgeSide 2.0, Cambridge, MA, EEA No. 16176**

Dear Anne:

Charles River Watershed Association (“CRWA”) submits the following comments on the Expanded Environmental Notification Form (“ENF”) for CambridgeSide 2.0 in Cambridge, Massachusetts filed with the MEPA Office on March 16, 2020. This project, which is situated along the banks of the Lechmere Canal (an inlet of the Charles River), proposes to redevelop several portions of the existing CambridgeSide mall – namely, the big box stores and the parking garage – into residential, retail, office, laboratory, and restaurant uses. The entire project is located on filled tidelands and will require an amended Chapter 91 waterways license.

As an initial matter, we are pleased to see that climate resilience has been considered in the design of this project. Planning for 2070 flood depths and future rainfall projections is important, as is incorporating cooling and heat island-relief into the project design. Tree planting and other landscaping features will also provide benefits in terms of both flood control and cooling. Contribution to the City’s Tree Replacement Fund will further enhance these benefits.

In order to maximize this project’s climate resilience and public benefits, we request that the following recommendations be included in the Draft Environmental Impact Report (“DEIR”) and/or the Chapter 91 waterways license application, as appropriate.

*Public Open Space and Access*

As noted in the Expanded ENF, this project will require an amended Chapter 91 waterways license that must comply with the waterways regulations found at 310 CMR 9.00. We look forward to providing more detailed comments on the application for the amended license, but at this point note the following.

We do not necessarily agree that the “provision of space (e.g., shipping containers or kiosks) for small pop-up retail incubators within Canal Park” qualifies as a public benefit, especially

in an area that is already so retail heavy. While a small amount of kiosks provided on a temporary basis might be beneficial to some local vendors, we have seen shipping containers in other local areas be transformed into semi-permanent retail structures dominated by non-local vendors to the detriment of publicly-accessible open spaces and parks. We therefore recommend that the proponent focus on activation of public spaces in ways that create meaningful public engagement and provide benefits to the community that would not otherwise exist. To the extent retail exists at all in public open spaces, it should be compatible with and not in any way impede upon use of these spaces by the general public.

### *Stormwater*

Given this site's proximity to the Charles River, stormwater runoff from impervious surfaces on the site will have a significant environmental impact. As discussed during the virtual site visit, alternatives to impervious surfaces such as porous materials for walkways should be used wherever possible. We appreciate the proponent's commitment to using infiltration chambers and tree box filters for managing stormwater. In the DEIR, we request that for each of the sub-watersheds, the proponent provide sizing of Best Management Practices ("BMPs") and documentation of compliance with the Total Maximum Daily Load ("TMDL") for nutrients in the Lower Charles River, as well as the TMDL for pathogens in the Charles River. While the proponent has acknowledged the existence of both TMDLs, more information is needed in the DEIR to demonstrate how compliance will be achieved.

We are glad to see that this project is planning to divert 400,000 GPD of stormwater from the MWRA combined sewer, but the Expanded ENF does not describe how that stormwater will be treated. Further explanation should be provided in the DEIR.

### *Other Considerations*

Finally, we request that the fountain located within the canal be shut off when there is a cyanobacteria bloom. We understand there have been concerns raised in the past about the fountain spraying cyanobacteria into the air and potentially causing health impacts. While reduction and elimination of cyanobacteria blooms is CRWA's ultimate objective – and the green infrastructure measures suggested herein can help to achieve that – in the event blooms do occur, it is critical to implement public health protections, which include shutting off the fountain.

Thank you for considering these comments, please do not hesitate to reach out with any questions at [hmillier@crwa.org](mailto:hmillier@crwa.org) or 781-788-0007 x 234.

Sincerely,



Heather Miller, Esq.  
General Counsel & Policy Director