



May 26, 2020

Via Email

Purvi Patel
Environmental Analyst, MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
purvi.patel@mass.gov

Re: ENF for the Curtis Apartments, Mechanic Street, Bellingham, MA

Dear Purvi:

Charles River Watershed Association (“CRWA”) submits the following comments on the Environmental Notification Form (“ENF”) for the Curtis Apartments in Bellingham, Massachusetts filed with the MEPA Office on April 30, 2020. This project is located on 15 acres of partially cleared land that has primarily been used for various types of storage. The proposed project involves construction of 250 apartment units in 5 4-story buildings; a clubhouse; carports; associated amenities including a pool, outdoor living room, playground, dog park, and recycling center; and paved driveways, parking and loading areas, a maintenance building, utilities, lighting, and landscaping.

While CRWA supports the creation of new affordable housing, we urge the project proponent to maximize environmental benefits on site for future residents and the surrounding community. Creation of 6.5 new acres of impervious surface will increase stormwater runoff, decrease groundwater recharge, and exacerbate heat effects. Trees and vegetation are also critical to maintaining air and water quality and providing cooling. Climate change is causing increased heavy rainfalls, more drought, and hotter temperatures. By minimizing impervious surfaces, maximizing the functioning of natural ecosystems, and employing green infrastructure, this project can help to mitigate the effects of climate change and result in a healthier environment for residents and the community.

Conservation and Restoration Opportunities at this Site

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. This site offers significant conservation opportunities on the undeveloped portions of the site that would benefit water resource protection. Specifically, 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. The portion of the site that is currently developed is an upland area within the watershed where

restoration is needed. This property is also located within a green space desert, meaning that maximizing trees and open space on the site would provide critical environmental benefits in an area where they are particularly needed.

Impervious Surface & Stormwater

This project proposes to add 6.5 acres of new impervious surface for a total of 7 acres on the 15-acre site. Impervious surfaces exacerbate stormwater pollution and runoff and contribute to heat island effects. Creation of new impervious surfaces should therefore be avoided wherever possible. Green infrastructure should be extensively incorporated into parking lots and other paved areas to treat stormwater generated by impervious surfaces and provide cooling benefits for residents. The ENF does not say whether the proponent has considered alternatives to impervious surfaces such as porous pavement for walkways or green roofs or cisterns to reduce the volume of runoff generated by the project. Given the importance of groundwater recharge on this site for protecting water supplies and improving drought resilience, as well as the existing lack of green space in this area, green infrastructure alternatives should be prioritized in the project design.

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. Additional stormwater management plans detailing system sizing, type, and location should be provided, 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.

Trees & Vegetation

Trees and other vegetation protect air and water quality, help to control stormwater runoff and flooding, and provide natural cooling. Native trees and shrubs should be planted within proposed vegetated areas, and trees should be planted on site along proposed roadways and in proposed landscaped areas wherever possible.

Water Conservation

This project would result in the use of 43,500 additional gallons of water per day. We appreciate the ENF's focus on water efficiency, particularly in the form of limited 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. We therefore encourage the proponent to do as much as possible to limit all outdoor watering.

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

Sincerely,

A handwritten signature in blue ink that reads "Heather Miller". The signature is written in a cursive style.

Heather Miller, Esq.

General Counsel & Policy Director

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