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*Via Email*

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**Re: Comments on Waltham High School DEIR, 554 Lexington Street, Waltham**

Dear Page:

Charles River Watershed Association (“CRWA”) submits the following comments on the Draft Environmental Impact Report (“DEIR”) for the Waltham High School project in Waltham, Massachusetts filed with the MEPA Office on May 15, 2020. The City of Waltham’s proposed development includes a new school building, athletic field, garage, parking lots, roadways, and pedestrian paths. Given the magnitude of this project and its proposed environmental impacts, we appreciate the Secretary’s decision to require an EIR to fully analyze the project’s impacts and allow the public to meaningfully participate in the project’s development.

CRWA’s previous comments on the Environmental Notification Form (“ENF”) for this project raised concerns about the proposed impacts to wetlands, destruction of an entire section of stream, clearing of trees, and creation of significant new impervious surface on the site. We explained that these alterations to the natural environment would result in impacts including increases in stormwater runoff and corresponding decreases in groundwater recharge, exacerbation of heat effects, loss of wildlife habitat and natural flood storage, and alteration of natural hydrology, and that these impacts would be further exacerbated as climate change brings increased heavy rainfalls, more drought, and hotter temperatures. At the same time, we explained that by minimizing impervious surfaces, maximizing the functioning of natural ecosystems, and employing green infrastructure, the City could mitigate the effects of climate change and create a healthier environment for students and the community.

We applaud the City for going back to the drawing board and redesigning the project to reduce its overall impact on the environment. Avoiding direct impacts to the stream and wetlands and reducing the total amount of land to be cleared and impervious surface to be created are all positive changes to the project.

We also urge the City to consider additional measures to promote a healthy environment for both students and the surrounding community. The project still proposes to create nearly 10

new acres of impervious surface, which will increase stormwater runoff, decrease groundwater recharge, and exacerbate heat effects. Clearing trees and vegetation, especially mature trees, will affect air and water quality and reduce cooling benefits. As CRWA noted in its ENF comments, by preserving as much wooded area and the ecosystem processes it provides as possible, the City would improve its climate resilience and be better able to handle drought. Given that this property is located within an environmental justice community and a green space desert, protecting the natural resources on site provides critical environmental benefits in an area where they are particularly needed.

#### *Land Alteration and Tree Preservation*

We appreciate that the total amount of proposed land alteration has been reduced as compared to what was originally anticipated in the ENF. Trees and other vegetation protect air and water quality, help to control stormwater runoff and flooding, and provide natural cooling. The DEIR indicates that 10 acres will be cleared for development but says the exact number of trees that will be cut down is unknown. It also does not evaluate the impacts of clearing trees and vegetation on the site.

As CRWA previously commented, the City should avoid cutting down as many trees (especially mature trees) as possible. Mitigation of tree removal should be required onsite and there should be no net loss of trees from the site – any trees removed should be replaced with trees along proposed roadways and in proposed landscaped areas to help mitigate temperature impacts. Mature trees should be replaced on a 2 to 1 basis. While the benefits of new young trees will not be the same as the mature trees removed, it will be a start.

#### *Impervious Surface and Stormwater Management*

As CRWA noted in its ENF comments, creation of new impervious area should be avoided wherever possible. The City is now proposing to add 9.54 acres for a total of 14.16 acres on the site. The City should consider whether more can be done to reduce the amount of surface parking, roads, and other impervious surfaces, while incorporating green infrastructure into parking lot design to treat excess stormwater generated by the impervious surface. The DEIR indicates that the use of pervious pavers is no longer planned, but we urge the City to consider use of alternatives to impervious surface wherever possible. Alternatives such as porous pavement for walkways or use of green roofs or cisterns would help reduce the volume of runoff generated by the project.

Since this project will be required to comply with the Total Maximum Daily Load (“TMDL”) for Nutrients in the Upper/Middle Charles River, which requires no additional inputs of phosphorus to the river and a significant reduction from existing development, we are glad that the phosphorus load calculations have been provided in the DEIR. Given that infiltration opportunities on the site are limited, we urge the City to maximize the use of surface biofiltration strategies to ensure compliance with the TMDL.

Additionally, we are glad to see that the project will incorporate Low Impact Development (“LID”) techniques such as disconnecting impervious area, treating stormwater as close to the source as possible, and employing best management practices (“BMPs”) like water quality swales and bioretention areas. These BMPs should be implemented wherever feasible to manage runoff and protect water quality. Designing these BMPs to be visible and interactive for students and the public, as is proposed in the DEIR, will create important educational opportunities and serve as examples of how such measures can be implemented elsewhere.

We appreciate the DEIR’s discussion of the project’s vulnerabilities to climate change and measures that will be taken to promote climate resilience. We urge the City to continue analyzing impacts under future climate conditions. 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. Stormwater management measures must be designed to handle current and predicted future rainfall amounts using the best available science.

Runoff from the turf field remains particularly concerning because toxic PFAS chemicals have been found in artificial turf. The DEIR states that “[t]urf fields will be in accordance with DEP regulations for PFAS,” but DEP has only started to regulate PFAS and is currently only regulating these chemicals in drinking water supplies and on clean-up sites. The DEIR does not indicate whether PFAS chemicals may be present in the turf and if so, what the impacts would be. PFAS chemicals are known to cause serious health problems, including cancer. If PFAS chemicals are present in the turf, students using the field will be exposed, and if PFAS chemicals enter stormwater runoff from the field, downstream communities and waters will also be at risk.

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

Sincerely,



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