



December 2, 2020

Via Email

Erin Flaherty
Environmental Analyst, MEPA Office
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114
MEPA@mass.gov

**Re: ENF for the Mildred C. Hailey Phase One Development, Boston, MA
EEA No. 16292**

Dear Erin:

Charles River Watershed Association (“CRWA”) submits the following comments on the Environmental Notification Form (“ENF”) for the Mildred C. Hailey Phase One Development in Boston, filed with the MEPA Office on November 2, 2020. The project includes the demolition and reconstruction of seven residential buildings in the Jamaica Plain neighborhood of Boston. The project will add 0.63 acres of impervious area to existing conditions, for a total of 5.53 acres of impervious area on the 6.9-acre site.

CRWA supports the construction of housing near public transit and the inclusion of affordable housing in this project. We urge the project proponent to maximize environmental benefits on the site for future residents and the surrounding community. As the project proponent acknowledges, climate change is causing increased heavy rainfalls, more drought, and hotter temperatures. Increasing impervious surface will increase stormwater runoff, decrease opportunities for groundwater recharge, and exacerbate heat effects. 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.

The ENF does not indicate whether the proponent plans to incorporate low impact development practices, green infrastructure measures, or alternatives to impervious surfaces such as porous pavement for walkways and green roofs or cisterns to reduce the volume of runoff generated by the project. Techniques such as disconnecting impervious areas and treating stormwater as close to the source as possible, as well as best management practices like water quality swales and bioretention areas, should be implemented wherever feasible to manage runoff and protect water quality.

The ENF notes that the project will meet MassDEP’s stormwater management regulations; however, it does not refer to or explain how the project will comply with the Total Maximum Daily

Load (“TMDL”) for nutrients in the Lower Charles River Basin, finalized in 2007. 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 based on current land use.

We support the planting of native trees and shrubs within proposed vegetated areas, and urge that trees be planted on site along proposed roadways and in proposed landscaped areas wherever possible. Trees and other vegetation protect air and water quality, help to control stormwater runoff and flooding, and provide natural cooling.

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".

Heather Miller, Esq.

General Counsel & Policy Director

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