



CRWA

Saving the Charles River since 1965

April 10th 2020

Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Attn: Page Czepiga, MEPA Office
100 Cambridge St, Suite 900
Boston, MA 02114

RE: Allston Yards Project, EEA #15995

Dear Secretary Theoharides,

The Charles River Watershed Association (CRWA) has reviewed the above referenced Draft Environmental Impact Report (DEIR) and offers the comments below for your consideration.

CRWA is encouraged by the proponent's commitment that the Project will capture and infiltrate 1.25-inches of stormwater over the impervious areas of the applicable block. Additionally, the Master Plan's site design takes into consideration a landscape design that allows for infiltration and below grade storage structures to manage the majority of storm rainwater on site and address possible short-term flood-like situations.¹

The Project is expected to improve stormwater runoff quality and reduce peak flows by increasing pervious area across the Project Site, including the addition of the 1-acre Community Green, new landscaping, permeable pavers and street trees in the furnishing zone of all proposed streets, and through the use of treatment and infiltration facilities as part of the new drainage system.² However, the DEIR lacks a clear commitment to meeting the Charles River's Total Daily Maximum Load (TMDL) targets.

In fact the proponent has outright rejected the use of numerous green infrastructure strategies in the DEIR. "LID measures, such as rain gardens and grass swales, were considered to capture sidewalk and excess street runoff, but the Project ultimately chose permeable pavers because raingardens and swales require additional plant maintenance and function poorly during winter conditions when the

¹ DEIR Pg. 5-2

² DEIR Pg. 6-2

roads and sidewalks are salted.”³ There are no BMP design details or drainage calculations included in the DEIR that would indicate how the Project is expected to perform in terms of achieving its phosphorous reduction targets.

CRWA therefore expects that the above concerns will be addressed by the proponent in the FEIR. In addition to that we expect to see appropriate documentation of the design of all the green infrastructure BMPs that will be used with corresponding drainage calculations and demonstrated compliance with the TMDL. Please feel free to contact me at (781) 788-0007 ext-232 or via email if you have any questions.

Sincerely,



Pallavi Kalia Mande
Director of Watershed Resilience, CRWA
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³ DEIR Pg. 6-3