



December 15, 2014

Maeve Valley Bartlett, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Attn: Holly Johnson, MEPA Office

Re: I-90 Allston Interchange Project, Environmental Notification Form, EOEEA No. 15278

Dear Secretary Bartlett:

The Charles River Watershed Association (CRWA) attended the MEPA scoping session and several of the Task Force meetings and submits the following comments on the Environmental Notification Form for the above project. We also reviewed the two proposals for the Beacon Yards site Urban Design Workshop conducted by the Boston Society of Architects (BSA).

Stormwater

Stormwater management is very important for this project, as the proponent recognizes. The highway interchange, railroad yard, Soldiers Field Road and local roadways drain to the Charles River, which is impaired for, among other impairments, Chlorophyll-a, Escherichia coli, Nutrient/Eutrophication Biological Indicators, dissolved oxygen and Phosphorus (total). Polluted stormwater runoff is the leading cause of water quality impairments in the Charles River. All impervious surfaces in the urban environment carry high volumes of stormwater runoff and generate significant loads of major stormwater-related pollutants, including phosphorus.

- The ENF does not include any mapping or documentation of the existing stormwater infrastructure on site. It is therefore impossible to determine how the proposed alignments impact or interface with the infrastructure currently on site.
- Given the fact that this area was historically a tidal marshland that was filled over time, the DEIR should document how the site was engineered and paved over to make way for the current I-90 alignment.
- The site was also traversed by a tidal estuary and stream corridor (Salt Creek) that flowed into the southern section of site and discharged into the Charles River. It is assumed that this creek still flows in an underground culvert through the site and discharges flows from a larger sub-watershed that extends further south beyond the current site boundary. Historic site

hydrology should be discussed in detail in the DEIR since this could provide opportunities for stormwater management and environmental restoration.

- While the ENF states that the Charles River is listed as an Impaired Water and Total Maximum Daily Loads (TMDLs) have been developed (ENF Pg. 9-29 (Attachment 9)), there is no discussion of how the project will comply with the Charles River pathogen and nutrient TMDLs. While the proponent states that this redevelopment project will comply with the MA Stormwater Standards to the maximum extent practicable, we note that even full compliance with the state Stormwater Standards does not insure that the project will meet the *Total Maximum Daily Load for Nutrients in the Lower Charles River Basin, Massachusetts (2007)*. Pursuant to the Nutrient TMDL, the waste load allocation requires a 62% phosphorus reduction. The proponent should discuss in the DEIR how the project will meet the Nutrient and Pathogen TMDLs.
- The DEIR should identify all outfalls from which site runoff currently discharges and the results of any outfall water quality monitoring. Identification of both existing and future drainage catchments and drainage calculations should be included in the DEIR.
- The DEIR should include mapping of any soil contamination in project area that might impact the potential for groundwater recharge.
- The DEIR should explore the opportunity to treat the stormwater from the entire project area via a regional stormwater wetland that would not only provide a cost effective way of complying with the TMDL, but also serve as an ecological resource and public amenity.
- The proponent should explain the “potential modifications” and “improvements to the existing stormwater outfalls in the Charles River” that will be made (ENF at 20, 23).
- The maintenance and layover facilities proposed for the site will require enhanced stormwater controls and a robust stormwater pollution prevention plan.¹

Open Space and Streetscape Improvements

- As voiced by a number of Task Force members and in comment letters, this project offers an opportunity to rethink and to plan for the restoration of parkland along the Charles River. Given that the entire I-90 viaduct is going to be rebuilt and the proposed scheme includes the moving of Soldiers Field Road, the DEIR should evaluate and discuss the realignment of Soldiers Field Road further under the viaduct, and as far away from the river as possible. Creating new parkland would be a tremendous public and environmental benefit, and help to mitigate the environmental impacts of this project.
- The proponent should explain in detail its assertion that moving more of Soldiers Field Road under I-90 is not feasible. The viaduct itself should not be widened. It should also evaluate alternatives that would create more open space. While MassDOT states that it will continue to seek input on urban design issues from key stakeholders including the Boston Redevelopment Authority and Boston Society of Architects during the DEIR process, ENF at 10, the proponent in the ENF does

¹ The proponent should also discuss the basis for its determination that the project will generate 1800 gpd of industrial wastewater.

not discuss the open space recommendations provided by the two schemes presented as part of the BSA workshops. See,

<http://www.architects.org/programs-and-events/urban-design-workshops>. MassDOT should thoroughly evaluate both the Krieger/Mountjoy and Varanasi teams' proposals in the DEIR.

- In addition to creating more substantial public parkland adjacent to the river, the DEIR should also discuss an open space connection from the residential neighborhoods south and west of the site to the Charles River. This "Greenway" connection would not only provide public access to the riverfront and pedestrian bridge, it could also serve as a wet weather corridor, providing stormwater management and greater resiliency for intense storm events in a changing climate. The bicycle and pedestrian alternative connections put forth in the ENF should be expanded and CRWA would be happy to meet with MassDOT and others to discuss other alternatives that would enhance the user experience and draw people to the river.
- While the ENF mentions that Cambridge Street will be designed in accordance with the City of Boston Complete Streets guidelines², the description of the improvements makes not reference to the "Greenspace" component of the Complete Street Design. The DEIR should include specific details regarding the stormwater management BMPs that will be integrated as part of the Cambridge Street redesign.

Wetlands, Waterways and Tidelands

- While a Chapter 91 License is required for the project, ENF at 5, the ENF does not provide much detail on the impacts to c. 91 jurisdictional and wetland resource areas. The DEIR should include a comprehensive discussion on the impacts, public benefits, and mitigation measures proposed. Figure 6 included in Attachment 4 shows c.91 jurisdictional lands and the historic high water line. However, there is no discussion of the design implications of the above in the ENF.
- The ENF proposes a new footbridge for cyclists and pedestrians to cross over Soldiers Field Road to the Riverfront. The appropriate location of this footbridge should be studied in conjunction with the relocation of Soldiers Field Road between the I-90 viaduct and the River Street Bridge, in order to identify the best path to the Charles and its parklands.
- Given that the project is a non-water-dependent use and located on areas of filled and land locked tidelands, it will be subject to Public Benefit Review and Determination. The DEIR should discuss this in relation to c. 91 licensing.
- A larger scale detailed map(s) showing the areas of c. 91 jurisdiction within the project area should be included in the DEIR.

Lastly, the complexity of this project and community impacts requires close coordination and input from the community. Based on comments at the Task Force meetings we attended, there is much interest in continuing Task Force participation. We do not know if MassDOT is considering a special review procedure with a citizens advisory committee but we think a CAC with broad representation is important

² ENF Pg. 5

– one that meets regularly, is provided with resources and monies to hire consultants, and that is able to review and comment on documents in advance of filing. An effective model was the Muddy River Restoration Project CAC.

Sincerely,

Pallavi Mande
Director of Blue Cities

Margaret Van Deusen
Deputy Director and General Counsel

cc: James Cerbone, MassDOT