

December 13, 2021

Kathleen A. Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attn: Tori Kim, MEPA Director
100 Cambridge Street, Suite 900
Boston, Massachusetts 02114

Re: Comments on Environmental Notification Form (ENF), Alewife Park, Cambridge

Dear Secretary Theoharides and Director Kim:

The Mystic River Watershed Association (MyRWA) appreciates this opportunity to comment on the Environmental Notification Form filed for the proposed Alewife Park development in Cambridge, MA.

The Mystic River Watershed Association is a 501(c)(3) nonprofit organization founded in 1972. The organization's mission is to protect and restore clean water and related natural resources in the watershed's twenty-two communities and to promote responsible stewardship of our natural resources through educational initiatives. MyRWA accomplishes its mission by forging links with citizens' groups, universities, businesses and government agencies. These alliances enable MyRWA to accomplish work throughout the watershed, documenting current conditions and advocating for resource management and protection. This collaborative approach creates a strong watershed voice and attracts much-needed public and private resources to the Mystic.

As an environmental organization, MyRWA is particularly attuned to how proposed projects will affect existing conditions within urbanized areas like that surrounding Alewife Brook. MyRWA notes that the Alewife Park ENF is comprehensive and thoughtfully prepared, with strong effort to include contributions from community and citizens' groups.

MyRWA applauds the Proponent for including in its objectives:

- Improving public access around Jerry's Pond, with pathways, boardwalks, viewing stations, seating, and picnic areas.
- Fostering education and community-building by partnering with Green Cambridge and Mass Audubon to build and financially support a new Communal Garden and EcoCenter.
- Creating more connected pedestrian and bicycle connections within this commuter hub.
- Building with green infrastructure principles such as targeting LEED Gold -level certification, planting 100s of trees, and increasing permeable surfaces.
- Managing stormwater with retention strategies that anticipate regular, heavy rainfall.

This development offers a once-in-a-generation opportunity to create sustainable, resilient, and just infrastructure. The Alewife Park project would further benefit the natural resources of the Mystic River watershed if it were to satisfy the following:

Greater care with soil mitigation. Soil test results confirm the area to be heavily contaminated with asbestos and hydrocarbons. The Proponent needs to take every precaution to protect the health of the community during construction activities. This protection should include enclosing and venting across the site in areas as they are actively being disturbed.

More aggressive tree-planting plan. The Proponent outlines a commitment to planting “approximately 500” new trees on the site. We propose the area could support a much denser canopy. Using the [Miyawaki method of reforestation](#), the site would be improved by addition of microforests. Tree planting should be prioritized in areas where people transit through the site whenever possible.

Greater clarity on commitment to maintain new tree planting. The Proponent declares a dedication “to providing the care required to assure sustainability.” While the Proponent offers a concrete commitment to host a tree nursery for Cambridge’s Backyard Tree Planting Program. The commitment to ensure trees planted on site reach the goal of increasing the tree canopy with mature plantings needs to be met with a plan for watering, maintenance, and replacement of the trees planted.

Stormwater mitigation. Cambridge has highlighted Alewife as the area of the city most vulnerable to extreme flooding from climate change, and one of the six areas in the city most vulnerable to extreme heat, also from climate change. The Proponent includes plans for flood mitigation that can be improved:

- The Proponent identifies the a large area on the northeast of the site for compensatory flood storage. However using the southwest corner of the site (at the intersection of Rindge and Alewife Brook Parkway) for some additional compensatory flood storage would provide the benefits of (a) de-paving and making part of the land permeable and (b) save trees targeted for cutting at the northeast of the site.
- Many portions of the area around Jerry’s Pond are paved just under the topsoil. De-paving the entire area around Jerry’s Pond will improve the permeability of the site, and will have profound effects on the site’s ability to absorb and recharge storm water during flood events.
- The Proponent must meet Cambridge’s new development stormwater drainage standards.
- Stormwater run-off in this heavily trafficked area is also a concern. Converting the embankment along Rindge Avenue to wetlands will provide an area to filter road run-off contaminants before they enter the pond.

Connectivity. Remembering that this area sees heavy commuting and recreational use, the Proponent should design bike paths separated from pedestrian paths. Keeping bikes separate from pedestrians and from cars aligns with Cambridge’s Complete Streets program.

In closing, we are encouraged to see a development that will redevelop the existing site and provide benefits to the community and to the environment. If you have any questions or require additional information, please contact MyRWA at (781) 316-3438 or by emailing patrick@mysticriver.org

Sincerely,

A handwritten signature in black ink that reads "Patrick Herron". The signature is written in a cursive, flowing style.

Patrick Herron, Executive Director
Mystic River Watershed Association