



March 16, 2021

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

Re: Woburn Fire Headquarters, EEA #16333

Dear Ms. Murray,

The Mystic River Watershed Association (MyRWA) appreciates the opportunity to submit comments on the Woburn Fire Headquarters planned to be constructed from land in Forest Park in Woburn.

MyRWA was founded in 1972 to protect and restore the Mystic River, its tributaries and watershed lands for the benefit of present and future generations and to celebrate the value, importance, and great beauty of these natural resources. As part of this work, our organization has a powerful focus on climate resiliency and the acute risks of increased flooding and other impacts as climate disruption manifests in our communities.


While we very much appreciate the need for Woburn to continue to improve the infrastructure needed for public safety in Woburn, we have concerns about the plans for the site and the design standards for stormwater management.

Our first concern is that the plans for the site involve the deforestation of almost 3 acres of forested lands. Forested canopy is in rare supply in Woburn and plays an important role in regulating temperature in a future climate. In addition, naturally vegetated land has great capacity to sequester carbon from the atmosphere into biomass and then into soils, and thus reduce the impact of climate change. Forests and wetlands are particularly significant in this regard. When naturally vegetated land is disturbed or converted to developed use, significant amounts of carbon are released from living biomass and from soils, thus exacerbating and accelerating the warming of our climate. In addition to this loss of stored carbon (often referred to as carbon stocks), conversion of naturally vegetated land to developed land can greatly reduce or eliminate the future capacity of the land to sequester carbon. The land swap that occurred under Ch. 97 is for a parcel of open space that does not have trees, and as such is not an equivalent exchange of an environmental resource. **We feel that deforesting this site causes a significant environmental impact that is not offset by the land swap and as such should be mitigated. We request that the Secretary apply conditions that appropriately mitigate the loss of this important natural resource.**

Our second concern is the data used to establish the design standards for the stormwater management system. **We request that the City of Woburn reference the rainfall depth, duration, and frequency from the U.S. National Oceanic and Atmospheric Administration (NOAA) Atlas 14** to properly size the stormwater management on the site.

Thank you again for the opportunity to comment on this important infrastructure project.

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