



March 24, 2011

David Slagle
MassDEP-WRP
One Winter St, 5th fl
Boston, MA 02108

Dear Mr. Slagle:

The following are the comments of the Mystic River Watershed Association (MyRWA) on the Chapter 91 Waterways License Application Number W11-3237, filed by the Town of Winchester for the Aberjona River Flood Mitigation Program.

MyRWA is a grassroots organization dedicated to the protection and restoration of the Mystic River, its tributaries, and related natural resources throughout the watershed's 22 communities. Our organization is concerned about the adverse impacts on flood flows and aquatic habitat that may result from the proposed dredging and widening of the Aberjona River between Waterfield Road Bridge and Bacon Street Bridge. MyRWA previously expressed these concerns in our March 2010 comment letter on this project's Final Environmental Impact Report (FEIR). We would like to reiterate our concerns, and ask that MassDEP recommend appropriate actions during the Chapter 91 permitting process to minimize adverse impacts of concern.

While we acknowledge the need for flood mitigation in the Town of Winchester, we are concerned that the proposed project will shift the flood burden to downstream communities. The FEIR identified two mitigation projects that would address potential flood impacts: reconstruction of Scalley Dam, and removal of constrictions at Craddock Locks. The FEIR concluded, however, that Project 2 could proceed prior to completion of these mitigation projects without causing downstream flood impacts. The FEIR also asserted that the proposed flood mitigation measures would obviate the need for operational changes at the Amelia Earhart Dam. MyRWA urges MassDEP to consider requiring completion of the proposed flood mitigation measures prior to commencement of Project 2, and to consider requiring the addition of a fourth pump at the Amelia Earhart Dam. We believe these measures would protect downstream communities from potential increases in flood risks.

We are also concerned about the adverse impacts on wildlife and aquatic species resulting from construction of a proposed channel between the Waterfield Road Bridge and the Bacon Street Bridge. We strongly support that proposed construction methods include natural processes of riverbed meandering, sedimentation and re-vegetation; thus supporting long-term stream health. An alternative approach would be to widen the channel to the proposed 35-foot width, but allow the river to find its own channel during low-flow periods. The intent of these recommendations is to create more amenable habitat for wildlife and other aquatic animals and plants. MyRWA asks MassDEP to evaluate all design alternatives that will adequately protect and restore natural habitat in this stretch of the Aberjona River.

Thank you very much for the opportunity to comment on this proposal and your kind consideration of these comments.

EkOngKar Singh Khalsa, Executive Director

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