MYSTIC RIVER WATERSHED ASSOCIATION
20 ACADEMY STREET, SUITE 203
ARLINGTON, MA 02476

August 9, 2006

Secretary Stephen Pritchard
EOEA, Attn: Holly Johnson
251 Causeway Street, Suite 900
Boston MA 02114

Re: Stoneham Crossing EOEA #13836

Dear Secretary Pritchard:

The Mystic River Watershed Association (MyRWA), a grassroots organization dedicated to the protection and restoration of the Mystic River, its tributaries, and the related natural resources throughout the watershed's 21 communities, submits the following comments on the Expanded Environmental Notification Form (EENF) for the proposed Stoneham Crossing at 225 Fallon Road, Stoneham, Massachusetts.

MyRWA generally supports redevelopments that offer important economic benefits to the community and also provide additional flood control and improvements to water quality. In our opinion, the proposed project is too large for this site and will significantly impact surrounding wetlands. The EENF fails to identify reasonable alternatives that avoid potential environmental impacts (301 CMR 11.06(8)). We respectfully request that the Secretary require a Draft Environmental Impact Report that identifies reduced-build alternatives that reduce impacts to wetlands and incorporates a system of low-impact development techniques to address stormwater management.

Proposed Development Impacts Are Too Large

The EENF states that the proposed project is a redevelopment of an existing site containing an office complex. While a portion of the project qualifies as a redevelopment, there will be a 25-percent increase in land altered, and the total impervious area will nearly double. Therefore, a large portion of the project is, in reality, "new" development (and considered such under the Massachusetts Stormwater Management Policy).

Almost 5,000 square feet of bordering vegetated wetlands (BVW) will be filled. The isolated "B" wetland area will be completely filled in for the proposed parking and

garden center. A large fraction of the wetland impacts result from the parking lot configuration. We note that only 423 parking spaces are required by Zoning, but that the number of spaces provided (534) exceeds that requirement by over 25 percent. Removing unnecessary parking would reduce wetland impacts. A reduced build alternative with reconfigured building and parking layouts could also help to minimize adverse impacts to BVW.

A significant amount of alteration of the 100-foot buffer zone surrounding the BVW is also proposed. Work within the buffer zone to BVW "has a very high likelihood of adversely affecting those ecologically sensitive areas," either immediately or as a result of long term use. Inadvertent damage to these areas can easily occur and is irreparable[1]. The role of buffer zones in protecting wetland resource areas is widely described and documented in the scientific literature. In most cases, wetland scientists recommend protected, undisturbed buffers well in excess of 100-feet. Work in the buffer zone, particularly clearing of natural vegetation and soil disturbance, is likely to alter the physical characteristics of the resource area[2].

The proposed development includes alterations of the buffer zone up to the BVW border in many locations adjacent to wetland E. A significant amount of impervious area will be located within the 100-foot buffer to this wetland. A reconfiguration of the site plan or reduced build alternative that maximizes the amount of buffer zone preserved would serve to help minimize BVW impacts.

Alternatives Analysis is Inadequate

The alternatives considered in the EENF include a no-build alternative and locating the Home Depot store at another location. Given the scale of the development and the impacts noted above, the EENF fails to identify additional on-site alternatives that would minimize impacts to the environment. Such alternatives include a reduced-build alternative, such as one which removes the office center and relocates the garden center, as was noted by the DEP during its review of the Notice of Intent under the Wetlands Protection Act (DEP File No. 297-0320). Any alternative should reduce the number of parking spaces and reconfigure the site layout.

The alternatives should minimize the use of a "closed" (piped) drainage system by incorporating low impact development (LID) techniques. Example LID techniques that could be used include open drainage channels, disconnected impervious areas, reduced pavement widths, and compact parking spaces. These techniques aim to minimize impervious area, as well as reduce stormwater *volume* generated and peak flow rates through increased recharge and lengthened runoff travel times.

[1] Preface to the Wetlands Regulations 310 CMR 10.00, 1983 Regulatory Regulations, IV, A; V, A
[2] Preface to 2005 Regulatory Revisions

Additional Comments

1. Roof drainage is typically considered “clean” and should not be routed to the proposed VortSentry water quality units.

2. Although snow management is discussed in the project narrative, a snow management plan should be provided that clearly identifies on-site snow storage locations. As impervious areas are located adjacent to retaining walls and directly abut the BVW, “do not dump” signage should be provided to ensure that the BVW is not used for snow removal. Snow should not be stored within the 100-foot wetland buffer.

3. The Operations and Maintenance Plan should identify what parameters should be used to determine if the infiltration systems are operating as intended. A sediment depth criterion should be provided to trigger system cleaning.

4. The locations of the test pits were not noted on the Existing Conditions Plan. It is not clear if test pits were performed within the proposed footprints of the infiltration systems, whether adequate separation to groundwater, or depth to bedrock is provided.

5. HydroCAD output should be included in the EIR for review as opposed to being available upon request.

Thank you for providing MyRWA with the opportunity to review and comment on this project.

Sincerely,

Matthew Shuman
Policy Committee

cc: Town of Stoneham Conservation Commission