



**MYSTIC RIVER WATERSHED ASSOCIATION**  
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February 19, 2008

Mr. Robert Russo  
U.S. Army Corps of Engineers, New England District  
Engineering and Planning Division  
696 Virginia Road  
Concord, MA 01742-2751

**RE: Comments about Draft Environmental Assessment / Finding of No Significant Impact / Section 404 Evaluation Report for the Local Flood Protection Project, Aberjona River, Winchester, Massachusetts**

Dear Mr. Russo:

The Mystic River Watershed Association (MyRWA) is a grassroots organization dedicated to the protection and restoration of the Mystic River, its tributaries, and the related natural resources throughout the watershed's 22 communities. The right of groups of citizens to assess and comment on effectively the decisions of their community's Conservation Commissions, of DEP, of FEMA and of USACE is important to MyRWA and its members. We therefore are respectfully submitting comments on the Draft Environmental Assessment / Finding of No Significant Impact and Section 404 Evaluation Report for the Local Flood Protection Project, Aberjona River, Winchester, Massachusetts dated October 2007 ("Draft Report").

MyRWA understands that increased flooding in Winchester is indicative of a dynamic in the overall Aberjona watershed, with increased urbanization, paving, loss of natural flood storage and ground-water recharge. We also understand that, because of this dynamic, there is a need to mitigate flooding in Winchester, which is the basis for the USACE Local Flood Protection Project, Aberjona River, Winchester, Massachusetts ("Project"). However, there are several aspects of the Project that we believe have not been fully considered or may be destructive to either the immediate area of the Project or downstream in the communities of Arlington and Cambridge. We ask that our suggestions below be considered as potential additional analyses by USACE or additions / alterations to the Project as described in the Draft Report.

## Comments

1. **USGS Aberjona River Gauge:** The long record of flow from the USGS Aberjona River Gauge should not be discontinued, but a replacement gauge should be placed on the Mystic River near Medford Center to gauge a larger fraction of the Mystic River Watershed. This replacement should occur a full year before the Aberjona River Gauge is removed for construction, so that correlations may be made between the two. Also, if the Aberjona gauge can be replaced in a manner that continues the record of data collection since 1939, or if it can be replaced after construction, this should also be done.
  
2. **Additional Flood Storage Options:** The Town of Winchester should identify any and all additional flood storage options anywhere in Winchester to counteract past paving and filling. Even if only a partial solution, such a plan should be implemented. This action should be taken regardless of any other flood control effort for the Aberjona.

In addition, the USACE should evaluate the feasibility and effectiveness of deepening the channel rather than widening it. This option was not considered in the alternatives analysis in the Draft Report.

3. **Loss of Trees and Habitat Due to Channel Widening:** Approximately 0.75 acre of existing wooded riparian habitat will be cleared for the Project, including about 425 trees, as well as all trees below or within the granite block protection. Although this wooded habitat will be replaced with 1.0 acre of scrub-shrub vegetation, we don't believe this is a 'fair trade'. We are concerned with this loss of so many trees and the associated habitat.
  
4. **Quality Assurance for Replacement of Surface Soils and Sediments:** We understand that significant amounts of surface soil and sediment will be removed for the Project. In Section 4.4.2, the Draft Report states: "Existing surface soils and sediments will be removed and replaced with material likely to have lower concentration of metals, PAHs, and pesticides." The word "likely" in this paragraph is disturbing, and we would like an assurance that *more* impacted surface soils and sediments are *not* emplaced in the Aberjona River. This assurance may be attained either through sourcing from clean material or testing of the material prior to its emplacement.
  
5. **Loss of Parkland along the Mystic Valley Parkway:** We are concerned with loss of beautiful parkland along the Mystic Valley Parkway, and the "depressed sidewalk" which is an inferior pathway compared to the existing walkway.

6. **Effect of Project on Flooding Downstream in East Arlington and North Cambridge:** We reflect the concerns of the Arlington Selectmen in their MEPA Comment letter dated April 6, 2007 and the Cambridge City Manager on April 5, 2007, as well as the letter from Stephen Kaiser, Cambridge citizen and engineer to USACE dated February 18, 2008, that the downstream effects of the Project are not well understood. We urge the USACE to evaluate these effects in detail, publish detailed results of its studies and seriously consider whether the Project will not, indeed, simply push the flooding problem in Winchester downstream to its neighbors.

Thank you for your time and consideration, and we look forward to hearing from you. Please feel free to contact me at [johnr@mysticriver.org](mailto:johnr@mysticriver.org) with any questions regarding these comments.

Cordially,



John Reinhardt  
President

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