

Mystic River Watershed Association
20 Academy Street, Suite 306
Arlington, MA 02476
781-316-3438

March 26, 2010

Secretary Ian Bowles
Executive Office of Energy and Environmental Affairs
Attn: Deirde Buckley, MEPA Analyst
100 Cambridge St., Suite 900
Boston, MA 02114

Re: Aberjona River Flood Mitigation Program
EEA File No. 13046

Dear Mr. Bowles:

The following are the comments of the Mystic River Watershed Association (MyRWA) on the FEIR submitted by the Town of Winchester on the Aberjona River Flood Mitigation Program, EEA File No. 13046.

The Mystic River Watershed Association is an organization whose mission is to restore clean water in the Mystic River watershed, to protect that water quality and related natural resources within the watershed. While there is some need for flood mitigation in the Town of Winchester MyRWA is concerned about several aspects of the proposed project. It appears that the main goal of this project is to move as much Aberjona River water out of Winchester as fast as possible. The proposed methods for accomplishing this is increasing the hydraulic opening of several bridges, adding an additional culvert to the high school playing field and increasing the size of the river channel from Manchester Road to Bacon Street. The main problem with this proposal is that it does not take into consideration the flooding impacts on down stream cities and towns of this increased flow during high water. Such an assessment of the impacts of this project must make a realistic assessment of those impacts, which this project fails to do.

There are flood impacts on down stream communities that will not be mitigated by this project. While the Upper Mystic Lakes Dam rehabilitation project, the proposal for the removal of the constrictions at the Craddock Street Bridge and the addition of a pump at the Amelia Earhart dam are all designed to move water out of flood prone areas of the Mystic River, they are not adequate to prevent flooding in the Alewife Brook caused by the Mystic River backing up into the Alewife. The increased flow caused by the Winchester project will only aggravate those flooding problems. We feel that a better

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alternative would be for Winchester to identify and create flood water detention/retention areas in Winchester to realistically reduce the flows out of Winchester at the times of high water.

We are also concerned with the adverse impacts on wildlife and aquatic species with the plan to widen the river channel between Manchester Road and Bacon Street. Our main concern is the construction of the 8-foot wide low flow channel inside the proposed 35 foot wide stream bed. What this low flow channel will do is turn the riverbed into just that, a channel that does not allow the stream to establish its own flow pattern. A more sensitive alternative would be to widen the channel to the proposed 35 foot width, but eliminate the 8-foot low flow channel. This would allow the river to find its own channel during low flow periods, and therefore act more like a real river, and not an irrigation channel as visualized by the construction of the low flow channel. This would create a more realistic habitat for wildlife and other aquatic animals and plants. This would accomplish the Town's stated goal of making the impacts on wildlife only temporary. It would also result in a more realistic stream habitat.

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

Very truly yours
Mystic River Watershed Association

Michael A. Fager
Acting Policy Committee Chairperson