

Mr. Lance Grenzeback, Chairman Winchester Board of Selectmen Town Hall Mount Vernon Street Winchester, Ma 01890

August 25, 2016

Dear Chairman Grenzeback,

We write to you with regard to proposed plans to construct 295 housing units on approximately 9 acres on Forest Circle in Winchester. Our organization has concern that the project, as it is currently proposed, may cause impairment of environmental conditions in the area due to the inability to manage storm water within the proposed property. We feel that the project also significantly raises the risk of SSOs in the area, potentially contaminating the Aberjona River.

Sanitary sewer overflows ("SSOs") are unpermitted overflows that result from the failure of local sewer and stormwater infrastructure integrity and expose recreational users of nearby water bodies to dangerous bacteria, viruses and parasites.

The Mystic River Watershed Association has consistently advocated for the elimination of sanitary sewer overflows and promoted restoration and repair of the local sewer and stormwater systems as well as the use of green infrastructure to address this problem.

## MyRWA Mission

The Mystic River Watershed Association (MyRWA) is a non-profit organization dedicated to the preservation and enhancement of the Mystic River Watershed. The mission of MyRWA is 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. This includes working to improve the water quality in the Mystic River and all of its tributaries.

## **Concerns with the Forest Ridge Residences Project**

MyRWA has a history of successful collaboration on developments that benefit the community and contribute to the health of the watershed. Our organization recognizes the need to create affordable housing in Mystic River communities. However, we believe that affordable housing can and should be constructed consistent with responsible stewardship of local environmental resource areas. In this case, we are concerned that, without appropriate mitigation, the Forest Ridge Residences housing

project will add to existing problems in that area of Winchester, especially near the Fells and the Aberjona River, and as a result degrade ecological and hydrologic values of this part of the watershed.

The Fells and the water bodies within it are a unique environmental treasure that should be protected. Mass Audubon, in partnership with The Nature Conservancy and LandVest, developed Mapping and Prioritizing Parcels for Resilience (MAPPR) to allow Massachusetts conservationists to rapidly identify specific parcels that, if protected, could contribute the most to achieving land protection goals to make the landscape and our towns resilient to climate change (<a href="http://www.massaudubon.org/our-conservation-work/advocacy/shaping-the-future-sustainable-planning/current-projects/mappr-project">http://www.massaudubon.org/our-conservation-work/advocacy/shaping-the-future-sustainable-planning/current-projects/mappr-project</a>). In their Balanced Model, which takes into account all considerations for conservation, the wetlands portion of this parcel is one of the largest and highest priority undeveloped parcels for protection in Winchester.

The Forest Ridge's site elevation, large impervious surface, and drainage patterns risk contamination of the wetlands parcel and the North Reservoir in the nearby Fells Reservation, an important part of Winchester's water supply. Mass GIS indicates the wetland portion of the property as Zone A, contributing to the North Reservoir. Development of this site, as shown in the application, has no space for storm water basins or other measures that would clean and filter run off before it enters the wetland. Therefore, the runoff from this site, which would contain pollutants such as road treatment chemicals in the winter, could flow directly into the wetlands and the reservoir.

Another concern related to inability to manage the large amount of storm water from the large area of impervious surface is the run-off that would flow on the other side of the ridge down towards Forest Circle and continuing downhill towards the Aberjona. The Forest Ridge development will put significant pressure on the sanitary sewer system because of the extremely high density. This increase in sanitary sewer flow when combined with increased storm water runoff in the same area could significantly increase the frequency and severity of SSOs in the area, contaminating homes, public spaces, and the Aberjona River, which runs through downtown Winchester and into the Mystic Lakes. SSOs already occur during major storms in the Forest Street area near Cross Street, contaminating Davidson Park and the Aberjona River.

Thank you for your kind consideration. We would be happy to participate further in the review process in any way that would be helpful. If you have any questions or require additional information please feel free to contact us.

On behalf of the Mystic River Watershed Association,

EkOngKar Singh Khalsa, Executive Director

cc:

Winchester Town Manager, Richard Howard
Winchester Town Planner, Brian Szekely
Steve Powers, Winchester Board of Selectmen
Michael Bettencourt, Winchester Board of Selectmen
Jim Whitehead, Winchester Board of Selectmen
David Errico, Winchester Board of Selectmen
State Representative Michael Day
State Senator Jason Lewis
State Senator Pat Jehlen