



April 18, 2016

Alex Strycky, MEPA Analyst
Executive Office of Energy and Environmental Affairs (EEA)
100 Cambridge St., Suite 900 (9th Floor)
Boston MA, 02114
Attn: MEPA Office

Subject: Comments on the Charlestown Bus Facility – Shoreline Stabilization and Yard Improvements Project at 80 Alford St., Boston, MA 02116 Environmental Notification Form EEA#15487

Dear Mr. Strycky:

We are writing to express the support of the Mystic River Watershed Association for the Charlestown Bus Facility project described in the recent Environmental Notification Form (ENF) filing by the Massachusetts Bay Transportation Authority (MBTA), the project proponent.

Because our organization advocates for safe and efficient public transportation and public access to the watershed's natural resources that public transportation enables, we understand the need to repair and upgrade this facility so that the important service it provides can continue. We believe that the function of the MBTA buses staged at the Charlestown facility, which serves nearly 100,000 passengers daily, plays a key role in our watershed, both for public access and for economic health. We recognize and applaud the coastal resiliency, flood prevention, and stormwater treatment benefits emphasized in the ENF. The proponent's receipt of the U.S. Federal Transit Administration's competitive resilience grant funding speaks to the importance of the project. Moreover, we view this development as a long-awaited opportunity to establish a critical multi-use (pedestrian and bicycle) path connection along the Mystic River from Somerville to Route 99 in Boston.

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.

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Coastal Resiliency, Flood Prevention, and Stormwater Impacts

We find the proponent's project design to be thoughtful and sensitive to environmental concerns. MyRWA applauds the use of natural buffers in the project design. The plans make use of native vegetation, rather than gray infrastructure, to simultaneously achieve flood prevention, stormwater runoff filtering, and habitat creation. The engineering of the flood prevention wall to be three feet taller than the 100-year FEMA storm elevation is a wise and strategic recognition of the need for climate adaptation. We believe that the creation of a new wetland resource area is an acceptable mitigation measure to offset the fill required for the new embankment.

The stormwater improvements described in the proposal are also significant. We have observed sheens forming on the surface of the Mystic River basin that we believe can be mitigated by increased treatment of stormwater from facilities generating road oils. The ENF proposes to advance this goal and we applaud this initiative. We would also like to see inclusion of the potential bioretention area in the final plans. We are also concerned about the potential ecological and public health impacts of the dredging required to complete the shoreline stabilization work. Recent work by the U.S. Geological Survey, the state Department of Environmental Protection, and the state Department of Conservation and Recreation (DCR) established that sediments in the Mystic River basin contain elevated levels of biologically toxic chemicals including chromium, copper, lead, PAHs, and especially arsenic (Breault, Durant, and Robbat 2005). The proposed depth of dredging (3 feet) could potentially expose lower sediment layers, where, corresponding to historic industrial usage, the contamination is greater. We appreciate that the proponent is completing sediment testing and look forward to verifying that the proponent's will plan appropriately for the remediation of these potential contaminants to ensure that human contact is prevented.

Multi-use pathway and public access impacts

We are especially supportive of the proposed easement to allow the DCR to complete the multi-use pathway on the river-side of the flood prevention wall. This pathway would establish a continuous linkage from Somerville to Route 99 in Boston, creating a non-automotive transit path for residents and visitors traveling through the most densely populated area of the Mystic River Watershed. We believe that this development offers substantial benefits for public access and public awareness of the river itself, as well as potential secondary benefits in reducing traffic and automobile emissions. The DCR easement is a consequential and laudable outcome of a project that reflects MBTA's enduring commitment to promoting access to public transportation in the Commonwealth in all of its forms.

On behalf of the Mystic River Watershed Association,



Ek Ongkar Singh Khalsa, Executive Director

cc: Holly Palmgren, Manager of Environmental Construction, MBTA
MyRWA Policy Committee

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