CRWA
Saving the Charles River since 1965

April 20th 2020

Kathleen Theoharides
Executive Office of Energy and Environmental Affairs
Attn: Alex Strysky, MEPA Office
100 Cambridge St, Suite 900
Boston, MA 02114

RE: Riverside Station Redevelopment, EEA #16024

Dear Secretary Theoharides,

The Charles River Watershed Association (CRWA) has reviewed the above referenced Draft Environmental Impact Report (DEIR) and offers the comments below for your consideration.

CRWA is encouraged to learn that the amount of proposed public open space has been increased to 4.2 acres, from as previously proposed in the ENF. The proposed site design includes a significant reduction in paved surfaces across the Project Site (from approximately 68% impervious coverage to 37%), including a ½-acre of proposed permeable pavers. Since the ENF, the site design has evolved to include Green Infrastructure and Low Impact Design (LID) features that will exceed stormwater management regulatory requirements while creating public amenities, reducing heat island effect, enhancing natural habitat and reconnecting Newton residents to the Charles River Basin.[1]

Also as per the DEIR, under proposed conditions, new pervious spaces will infiltrate rainwater where it falls, thereby, increasing groundwater recharge and reducing peak discharge rates compared to existing conditions.[2] In addition, the project will use a combination of stormwater Best Management Practices (BMPs), which are integrated into the site design with a focus on groundwater recharge, water quality improvement, and phosphorous removal. Three subsurface infiltration systems are proposed to infiltration more than the 1-inch water quality storm from the Project Site's impervious areas, including proposed roofs, roadway, sidewalks, and plazas. The proposed drainage infrastructure collects, treats, and recharges stormwater runoff prior to discharging to the existing 60-inch drain culvert tributary to the Charles River. The combination of BMP techniques provides a minimum 65-percent reduction in total phosphorous from stormwater runoff, as required by the Total Maximum Daily Load (TMDL) criteria established by the EPA for the Upper/Middle Charles River.[3]

[1] Pg. 0-1, DEIR
[2] Pg. 7-3, DEIR
[3] Ibid

The DEIR includes a variety of stormwater management practices such as bioretention basins, planters and curb bump outs, permeable pavement, street trees with sand-based structural soil and rainwater harvesting and Infiltration chambers.[4] However there are no sizing calculations or estimates for phosphorus reductions estimates included in the DEIR. In fact there is no mention of any of the above BMP's except for the infiltration chambers in the Stormwater Management Plan dated December 2019. Having reviewed the Stormwater Management Plan CRWA would like the proponent to address the following issues identified in the FEIR:

- The stormwater report is missing key site data and analysis and although it purports to show improvements in stormwater quality will occur as a result of the project they are not demonstrated or quantified.

-Some new access roadway supports appear to be within 200 feet of a wetland and the project will involve new connections to the existing Runaway Brook underdrain discharging to wetlands and subject to Conservation Commission jurisdiction and oversight. The plan should identify all the aspects of the work that trigger Conservation Commission notifications and oversight.

-The proponent has not evaluated what happens when the stormwater discharge to Runaway Brook is severely cut back by rerouting existing stormwater to the infiltration system. This may be a very important impact as Runaway Brook (which currently receives nearly all the stormwater flow) drains the Woodland Golf Course and is probably laden with eutrophication chemicals such as ammonia and nitrogen and chemicals that cause low dissolved oxygen contents. By removing the Riverside contribution under low flow conditions these discharges will be at much higher concentrations and poorly flushed and may lead to algal blooms with low dissolved oxygen in the exposed wetlands along the Charles River.

- The project proponent needs to model the proposed groundwater table and gradients prior to and following the proposed subsurface infiltration systems to understand how groundwater will be impacted at the site and downgradient rail maintenance facility.

- The report provides no description of the current regulatory environment of the affected existing discharge. The proponents did not describe the outfalls as a MS4 stormwater sewer regulated by Newton Public Works. The report does not indicate that the outfalls are within the MS4 program as outfalls NEW-44B, NEW-47 and NEW-48. It does not discuss meeting any of the MS4 requirements for BMPs or the city ordinances (Newton Ordinance No Z-45 30-5(c)) and required treatment requirements. The facility stormwater system should be compliant with Newton's Stormwater Management plan for MS4 discharges because the Riverside discharge is to these outfalls.

CRWA expects that the above concerns will be addressed by the proponent in the FEIR. In addition to that we expect to see appropriate documentation of the design of all the green infrastructure BMPs that will be used with corresponding drainage calculations and demonstrated compliance with the TMDL. Please feel free to contact me at (781) 788-0007 ext-232 or via email if you have any questions or additional information to share.

[4] Pg. 7-6 DEIR

Sincerely,

Pallavi Kalia Mande
Director of Watershed Resilience, CRWA
pmande@crwa.org