



MYSTIC RIVER WATERSHED ASSOCIATION  
20 ACADEMY STREET, SUITE 203  
ARLINGTON, MA 02476

July 23, 2004

Secretary Ellen Roy Herzfelder  
EOEA, Attn: MEPA Office  
251 Causeway Street, Suite 900  
Boston MA 02114

Re: Parkway Plaza Redevelopment  
EOEA #13294  
Expanded Environmental Notification Form

Dear Secretary Herzfelder:

The Mystic River Watershed Association (MyRWA) is a non-profit organization dedicated to protecting and restoring the watershed's water quality, open space, and habitat. The Mystic River Watershed includes Mill Creek, which is the site of the proposed Parkway Plaza redevelopment. MyRWA has previously submitted comments to the City of Chelsea Conservation Commission in response to a Notice of Intent (NOI) under the Wetlands Protection Act submitted by the Applicant. Most of those comments have been addressed by the Expanded Environmental Notification Form (EENF). This comment letter presents some questions and concerns that remain.

MyRWA generally welcomes the redevelopment of abandoned sites like Parkway Plaza. Redevelopment offers important economic benefits to the community, and also provides an opportunity to improve water quality and reclaim open space. Many sites developed in the past did not meet adequate standards for stormwater and wastewater management, and provided little open space benefit to the public. Well-designed redevelopment can correct these past errors, and contribute to the recovery of local watershed resources.

Overall, MyRWA is pleased that the proponent has worked closely with the City of Chelsea and the Chelsea Greenspace Committee to improve public access at the site and provide viewing opportunities for the Mill Creek salt marsh. MyRWA is also pleased that the proponent has committed to upgrading the stormwater collection, treatment, and discharge system.

**We support a waiver for the Phase I project, subject to the condition that issues related to the 21E site process are addressed in some forum. We do not support a single EIR for the Phase II project, however.** We do not believe that this EENF is

sufficient to allow submittal of a single EIR for the Phase II project, since so little information is provided about the Phase II design in the EENF. We recommend that a Notice of Project Change or an additional ENF be required for Phase II, with an opportunity for public comment on the plans before they are approved under MEPA.

The following are our specific comments on the EENF submittal on the Phase I project, on the 21E issues that should be addressed for this project, and our recommendations for future MEPA requirements.

### **Design of the Phase I Project**

**Stormwater Management:** The proponent has modified the site plans to divert about half of the site's runoff to a new outfall, located downstream of the existing outfall and in a more well-flushed segment of Mill Creek. MyRWA believes this should help reduce existing stormwater impacts on the salt marsh.

To further reduce stormwater impacts, MyRWA encourages the proponent to separate roof runoff from parking lot discharges. Clean roof runoff might be used for nursery watering or other types of reuse. Separating roof runoff will provide two benefits to the receiving waters. First, segregating the discharges will provide additional outlets to the wetlands, and therefore better distribute and diffuse the stormwater discharges. Secondly, as proposed, discharge from the roof areas is through the water quality components of the site stormwater management system. Removing the roof runoff from the water quality treatment devices would increase their capacity to treat parking lot runoff.

MyRWA recommends that the Chelsea Conservation Commission establish a strict schedule for reporting on the maintenance efforts related to all components of the stormwater collection and treatment system. The catch basins and treatment units will only be effective if they are inspected and cleaned on a regular basis.

The proponent should upgrade the existing catch basins at the bridge abutment to provide an 80 percent TSS removal rate, or explain why this standard cannot be attained. The state's Stormwater Management Policy requires that redevelopments meet the Stormwater Management Standards to the maximum extent practicable.

**Impervious Surfaces/Parking:** While the proponent states that the proposed redevelopment will reduce impervious surfaces at the site, the reduction is minimal (0.9 acre). Reducing the impervious surface on the site even further will improve the capacity of the stormwater systems to effectively catch and treat all runoff. In order to reduce the amount of impervious surfaces, MyRWA recommends the following:

- Street widths within the site should be minimized to the smallest safe width possible.

- Some number of smaller parking spaces should be included, with a depth of 15 to 18 feet and a width of 7.5 to 8 feet. Up to 30 percent of the site parking should be designed for compact cars.
- Fewer parking spots should also be considered. MyRWA notes that the site has an excess of 191 parking spots for Phase I, and 534 parking spots for Phase II, over the number required by local zoning. The Applicant should clearly demonstrate the need for the proposed number of parking spaces, based on local zoning requirements and experience at similar nearby developments, such as Assembly Square in Somerville and Mystic View Center in Everett.

**Public Access:** MyRWA applauds the proponent for including a public walkway adjacent to the Mill Creek marsh. We are concerned, however, that the proposed fencing will detract from the residents' experience of the wetlands. We are also concerned that fencing both sides of the walkway, basically trapping pedestrians within a pen, may pose some safety issues in this urban environment.

In addition, Ed Reiner from the Environmental Protection Agency pointed out at the site visit that the proposed fence will prevent MassHighway Department from accessing the upper portion of Mill Creek, where it has committed to ongoing removal of accumulated sediments related to drainage from Route 16.

MyRWA suggests the proponent revise the plan to enhance safety, aesthetics, and public access. We recommend using as little chain link fence as possible, and instead using plantings and grading to achieve the same goals. The Division of Conservation and Recreation has had much success with its public walkways along the Charles River without using fencing. Lastly, we recommend that the proponent include access for MassHighway behind the proposed Home Depot site so it can remove accumulated sediment from Mill Creek.

### **21E Remediation Issues**

The Parkway Plaza site is undergoing a 21E process. As noted in the EENF, the Phase III evaluation has not yet been completed, and it is therefore not yet known how the site remediation will proceed. MyRWA has not yet reviewed the Phase II report. We believe that the findings are highly relevant to the MEPA review of this proposal, however, and we recommend that the Phase II conclusions be incorporated into the EENF.

It is critical that the 21E process and review of the site redevelopment plans be coordinated. For example, the Phase II exposure assessment and risk characterization should be based on exposure scenarios that reflect the close proximity of local residences to the site and the specific uses envisioned in the redevelopment plan. At the same time, the EENF should assess the potential that the landscaping, excavation and installation of new drainage structures proposed in the redevelopment might cause migration of subsurface contamination into Mill Creek.

MyRWA recommends a more explicit integration of the findings of the 21E process and the MEPA evaluation of the redevelopment – either through a full EIR for the Phase 1 project or by some other means.

### **Further MEPA Requirements**

As stated earlier, MyRWA does not oppose a Phase I waiver for the project components analyzed in this EENF, subject to the condition that the 21E hazardous waste remediation issues are adequately addressed in some form. There are substantial economic benefits to the local area in moving forward with this project, and the proponent has committed to reasonable stormwater management and open space access. We strongly disagree, however, that MEPA requirements for Phase II should be limited to a Single EIR. There is simply too much not yet known about the Phase II plans, the actual impact of Phase I, and the Phase III site remediation plans at this point to limit future MEPA and associated public review for this site. It is unusual to allow separation of such a significant project into two phases and a Phase I waiver to begin with. We urge MEPA to require a Notice of Project Change and a full EIR for the future redevelopment of this site, unless the proponent is able to show that the Phase II components are truly separable from the Phase I components or that the project as a whole meets the conditions for a Single EIR.

### **Conclusion**

The proposed Parkway Plaza redevelopment provides an opportunity to enhance the quality of Chelsea's environment and provide economic benefits to the City as well. We applaud the proponent for working with local groups and public agencies to provide additional public benefit. Many of our initial concerns with the proposed work have been addressed by the proponent in their EENF submittal. Nevertheless, given the scale of the project, MyRWA believes some changes in the Phase I plan, as discussed above, would reduce the impact of the project on the local environment.

Thank you for considering these comments and questions. Please contact me if you have any questions about this letter, or if MyRWA can be of any assistance in your review of this project.

Sincerely,

Nancy Hammett  
Executive Director

cc: LeAndrea Dames, MEPA  
Chelsea Conservation Commission