



The Commonwealth of Massachusetts
Metropolitan District Commission
Planning Office

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October 19, 2000

Bob Durand, Secretary
Executive Office of Environmental Affairs
Attention: Laura Rome, MEPA Office
251 Causeway Street - 9th Floor
Boston, MA 02114-2150

Dear Secretary Durand:

The Metropolitan District Commission (MDC) has reviewed the ENF for the Mugar parcel in Arlington, Massachusetts. It is MDC's opinion that a DEIR should be required for the proposed development. Following is an explanation for this position.

In 1992 the MDC prepared a comprehensive "Land Acquisition Program" that assessed the importance of all key open space parcels remaining within the MDC Park System's jurisdictional boundary (i.e. 37 cities/towns in the metropolitan region). Combined input from twelve public meetings, local and state officials' input, and MDC staff resulted in 205 proposed acquisitions. These properties comprised, in 1992, the most critical unprotected open space remaining in the metro. region. Fortunately, many of these key properties have been acquired by MDC over the past eight years. Due to a variety of factors, the Mugar parcel was, obviously, not one of them.

As part of the 1992 Program MDC developed an objective model for prioritizing the 205 potential acquisitions. A property received points if it met certain criterion. Examples of the criterion used follow: cultural or natural areas that are endangered or unique to the Commonwealth, including urban wilds; important ecosystems that cross political boundaries such as watersheds and wildlife habitats; recreation opportunities that are beyond the means of a single community; a parcel that strengthens existing park boundaries and prevent inappropriate intrusions; abuts water resource area; etc. Using this objective model the Mugar parcel was ranked 12th out of the 205 most significant unprotected open spaces remaining in the Metropolitan Region.

Unfortunately, recent funding limitations for parkland acquisition have significantly reduced MDC's ability to continue our proactive program of acquiring critical open space parcels such as Mugar. MDC does believe that the development of this parcel will be a major environmental loss to both the biological diversity of the Alewife Reservation and the surrounding environs, as

well as the Metropolitan Region's open space needs. We further believe that a property of such regional environmental importance should clearly require a DEIR.

Some of the elements that are not adequately addressed by the ENF and should be included in a DEIR follow:

- * A baseline analysis regarding the current conditions of flooding and an analysis of flood water retention on the subject site. In addition, current flooding throughout the watershed should be considered.
- * More detailed plans regarding the compensatory flood storage mentioned in the expanded ENF. MDC would like to note that counting flood storage as wetland mitigation, while perhaps permissible, is still harming the ecological health of the wetland system and adjacent habitat.
- * Analysis of pollutants that would be generated from the creation of 1,145 parking spaces, including a strategy for dealing with this pollution and identification of alternatives to having so much new parking.
- * A more comprehensive delineation of all wetland resources, and an analysis of impacts based on this delineation.
- * Preparation of detailed plans clearly outlining the construction process and its related impacts (e.g. boundaries of the construction activity, the amount of fill being exported and imported, and the level of impact to the existing wetlands from vehicle and fill storage).

In conclusion, the MDC would like to reiterate its belief that the Mugar parcel is among the most significant, privately owned open space properties remaining in the metropolitan region. While we understand that some sort of development of this parcel may occur, it would be very unfortunate for the Alewife ecosystem if the proposal before us were approved. The proponent would be hard-pressed to come up with a proposal that showed less concern for the ecological importance of their property.

Sincerely,



Daniel Driscoll, Sr. Planner
MDC Planning Office

Cc: Julia O'Brien, MDC Planning Director