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May 1, 2003

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CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS ON THE FINAL ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Emerald Necklace Environmental Improvements Master Plan and Phase I Muddy River Flood Control, Water Quality, Habitat Enhancement, and Historic Preservation Project

PROJECT MUNICIPALITY : Boston and Brookline

PROJECT WATERSHED : Charles River

EOEA NUMBER : 11865

PROJECT PROPONENT : Boston Parks and Recreation Department and Town of Brookline

DATE NOTICED IN MONITOR : March 25, 2003

As the Secretary of Environmental Affairs, I hereby determine that the Final Environmental Impact Report (FEIR) submitted on this project **does not adequately and properly comply** with the Massachusetts Environmental Policy Act (M.G.L. c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00), and I hereby require the preparation of a Supplemental Final Environmental Impact Report (SFEIR).

Today's decision is directed at the deficiencies of the FEIR document, and in no way reflects on the goals of the project or its merits. I remain committed to the successful implementation of this important public project. The Executive Office of Environmental Affairs (EOEA), together with the project proponents and numerous dedicated people from agencies, advocacy groups, and the general public have invested considerable time and resources into the planning for the rehabilitation of the Muddy River and its environs, one of the nation's finest linear parks. Much work remains to be done before the project can pass muster with state permitting agencies, and before the Commonwealth can commit the next level of significant public

funding to the project¹. Nonetheless, I will continue to work with the proponents, the Citizens Advisory Committee, the Maintenance and Management Oversight Committee, and the many individuals who have committed their time and energy to ensure that this project moves forward. While this decision is a setback for the project schedule, it is also an opportunity to bring a wide range of interested parties together cooperatively, to rethink certain elements of the project, and to develop the institutional infrastructure that can make this project a national model for urban park rehabilitation and successful long-term management.

Standard of MEPA Review

As described in more detail below, the FEIR has not adequately addressed several issues critical to the project design. However worthy the project may be, the need to consider alternatives, document impacts, and demonstrate that the project design avoids, minimizes and mitigates Damage to the Environment is necessary as a matter of law, and is critical to protecting the Commonwealth's considerable financial investment in the project. For an FEIR to be deemed adequate, Section 11.08(8) of the MEPA Regulations requires me to find that "the aspects and issues have been clearly described and their nature and general elements analyzed in the EIR or during MEPA review, that the aspects and issues can be fully analyzed prior to any Agency issuing its Section 61 Findings..."

As described in more detail in this Certificate, after examining the record before me, including but not limited to the Draft and Final EIRs, written comments received, correspondence related to the Charlesgate waiver decision, and the Emerald Necklace Master Plan, I find that there is not enough information on alternatives, impacts, and mitigation to meet that regulatory standard. The FEIR has not clearly described and analyzed the general elements of several critical aspects of the project. In addition, the state permitting agencies have commented that the

¹ The Commonwealth is authorized to transfer \$24,000,000 to help fund the project upon successful completion of the EIR process. Since 1984, the Commonwealth has provided approximately \$16,000,000 to the proponents for improvements to the Emerald Necklace, most of which has required no cash match. The Commonwealth has also provided the proponents with other forms of direct financial and in-kind assistance with the Emerald Necklace over this period. The total public investment in the project currently under MEPA review (including federal, state, and local contributions) totals more than \$92,000,000.

FEIR provides insufficient information upon which to base their required Section 61 Findings. The two state agencies with the most direct involvement in the project (the Department of Environmental Protection and Department of Environmental Management) have both recommended additional MEPA review of the project to address key issues. Additional information and enforceable commitments are also necessary prior to EOEAs own Section 61 Finding allowing the additional disbursement of state funds to the proponents.

Several aspects of the proponents' preferred alternative are not permissible under the state's wetland protection regulations, and the FEIR does not contain the information necessary to determine whether a variance to those regulations is appropriate. The FEIR has also failed to provide adequate discussion of the maintenance and management aspects of the project, and has failed to address several issues specifically highlighted in the Certificate on the Draft EIR and in the Chalesgate Phase I Final Record of Decision. The resolution of these issues is central to the project meeting its potential, and to ensuring that the Commonwealth's financial support remains tenable in the current severely constrained fiscal climate. The remainder of this Certificate focuses on the additional information needed to allow the project to move forward in a manner that is consistent with the requirements of state environmental law, consistent with sound fiscal management policies, and worthy of the resource the project is designed to restore and protect.

Project Description

As described in the Environmental Impact Report, the proposed project involves a range of physical improvements and management practices that will produce flood control, water quality improvements, habitat enhancement, landscape restoration, pedestrian and automobile circulation improvements, and building and bridge restoration along the Muddy River. The project constitutes the first phase in the long-term restoration of the entire system of Emerald Necklace parks in Boston and Brookline. This MEPA review is proceeding under a Special Review Procedure (SRP), established in a certificate dated April 29, 1999. Pursuant to the SRP Certificate, a Citizens Advisory Committee (CAC) representing a full range of interested parties has met regularly over the past four years, and it has reviewed in detail drafts of the FEIR document and submitted comments on the FEIR. The project is also subject to a Memorandum of Understanding (MOU) executed in November 1999, by and among the Executive Office of Environmental Affairs, the Department of Environmental

Management, the Massachusetts Emergency Management Agency, the Boston Water and Sewer Commission, the Town of Brookline and the City of Boston.

As described in the FEIR, the project is comprised of six geographic elements: Charlesgate, the Back Bay Fens, the Riverway, and the three ponds within Olmsted Park (Leverett, Willow, and Wards Ponds). The FEIR describes each element as follows:

- Charlesgate: removal of waterway obstructions under Ipswich Street; dredging 3,300 cubic yards (c.y.) of sediment and debris; and landscape rehabilitation. (In July 2002, a Phase I Final Record of Decision granted a waiver allowing much of this work to proceed pending completion of the FEIR).
- Back Bay Fens: daylighting culverts at the Fens Bridge and former Sears parking lot to restore the Olmsted-designed shoreline; bank-to-bank dredging to remove 95,500 c.y. of sediment and debris, and 23,500 c.y. of Phragmites; installing new arch culverts under the Riverway and Brookline Avenue; reconstructing roadway storm drain systems; and bank and landscape rehabilitation.
- Riverway: bank-to-bank dredging to remove 21,200 c.y. of sediment and debris, and 10,000 c.y. of Phragmites; reconstructing roadway storm drain systems; and bank and landscape rehabilitation.
- Leverett Pond: dredging to remove 23,900 c.y. of sediment and debris; and bank, island, and landscape rehabilitation.
- Willow Pond: dredging to remove 5,900 c.y. of sediment and debris; and bank, path, and landscape rehabilitation.
- Wards Pond: dredging to remove 15,600 c.y. of sediment and debris; and bank and landscape rehabilitation.

The project also includes project-wide Best Management Practices (BMPs) for stormwater management and a maintenance and management plan. The proposed BMPs include both structural and source control BMPs, including street sweeping, catch basin cleaning, and particle separators. The FEIR also identifies the proponent's preferred management structure for the project.

Required Permits and MEPA Jurisdiction

The project will require several variances under the Wetlands Protection Act, a 401 Water Quality Certificate, a Chapter 91 License, and a Special Waste Determination, all from the Department of Environmental Protection (DEP). The project

will require a Section 404 permit under the Federal Clean Water Act from the U.S. Army Corps of Engineers. The project will also require a Sewer Use Discharge Permit and Section 8(M) permit from the Massachusetts Water Resources Authority (MWRA). Because the Emerald Necklace parks are listed on the National and State Registers of Historic Places, the project is subject to review by the Massachusetts Historical Commission, the Boston Landmarks Commission, and the Brookline Preservation Commission. The project is receiving financial assistance from the Commonwealth; therefore, MEPA jurisdiction is broad in scope, extending to all aspects of the project with potential impacts on the environment.

SCOPE OF THE SFEIR

General

As modified by this Certificate, the SFEIR should be a stand-alone document prepared in accordance with the general requirements for outline and content found in Section 11.07 of the MEPA regulations. The SFEIR should include a copy of this Certificate and a copy of each comment letter received. The proponents should circulate the SFEIR at a minimum to those parties who submitted written comments on the FEIR and to any agencies from which the proponents will seek Agency Actions. In addition, the proponents should provide a reasonable number of copies free of charge on a first come, first served basis.

Alternatives

Two aspects of the project will require additional detailed alternatives analyses: wetlands/water quality and project management structures. The SFEIR should include the alternatives analyses necessary for DEP to evaluate any requests for variances from the Wetland Protection Act regulations. The SFEIR should also include additional information on alternative management structures. I explain both requirements in more detail below. I will allow the proponents to incorporate the additional alternatives analyses into the specific chapters in which they are relevant. The SFEIR need not include a separate, stand-alone alternatives analysis.

Project Permitting

The permitting for the project (particularly for wetlands) is complex. The SFEIR should include a summary of all permits needed for each subarea of the project, and demonstrate either how the project design meets applicable performance standards, or

how the project meets criteria for a variance from applicable performance standards. The SFEIR should also document any efforts the proponent has made to consult and/or coordinate with the permitting agencies.

Wetlands

Portions of the project will qualify for limited project status under the Wetland Protection Act regulations (see 310 CMR 10.53(4)). However, significant portions of the dredging work do not meet the performance standards contained in 310 CMR 10.00 and will therefore require a wetlands variance. DEP may allow a variance upon a finding that: 1) the project serves an overriding public purpose, 2) there are no feasible alternatives to the project that would meet the regulatory standards, and 3) that the project design incorporates maximum feasible mitigation for any impacts found unavoidable. The FEIR has argued that much of the project will qualify as a limited project, missing the opportunity to present analysis that may justify a wetlands variance for some or all portions of the project. The SFEIR needs to include much more information on those aspects of the project, outlined below and discussed in detail in the comments from DEP, which do not appear to meet limited project status, and to discuss how those aspects of the project might qualify for variances from the Wetland Protection Act regulations.

The proposed bank-to-bank dredging of the Back Bay Fens appears to meet the limited project provisions of the Wetlands Protection Act regulations. However, since dredging at Charlesgate was more extensive than originally anticipated, the proponents should verify that the proposed level of dredging in the Back Bay Fens is still necessary to achieve flood control goals.

The bank-to-bank dredging of the Riverway, on the other hand, does not appear to meet the limited project provisions, and the FEIR does not include sufficient information to evaluate the variance request. The SFEIR should reevaluate the need for bank-to-bank dredging in this project subarea, and include any additional information necessary to evaluate a variance request, if a variance still proves necessary.

The dredging of the three ponds can meet limited project provisions, but wetland replication must take place in the affected ponds, not in the Fens as proposed. In addition, the proposal for in-pond sedimentation basins would require a variance. The SFEIR should provide additional information to

demonstrate that the dredging operation (including replication) will be conducted in a manner that meets limited project provisions. The SFEIR should reevaluate the need for in-pond sedimentation basins, and evaluate this aspect of the project in light of the variance criteria.

The FEIR proposes the use of in-stream sedimentation basins to compensate for the sediment removal function currently provided by the *Phragmites* stands along the Muddy River. DEP has determined that the in-stream sedimentation basins do not meet limited project provisions and cannot meet the variance tests. The SFEIR must therefore evaluate alternative sediment removal methods (including the expanded use of BMPs as discussed below).

The extent of alteration to Bordering Vegetated Wetlands (BVW) and replication is unclear from the FEIR. The SFEIR should quantify BVW impacts and ensure that replication meets applicable performance standards. The SFEIR should examine whether the daylighting of the river proposed for the Fens Bridge and former Sears parking lot could provide an opportunity for BVW creation.

Water Quality

The FEIR argues that the in-stream sedimentation basins are not required for flood control, but rather to impound sediment associated with stormwater. The in-stream sedimentation basins therefore do not meet the requirements of the Commonwealth's water quality regulations (314 CMR 9.00). The SFEIR must examine alternative methods of sediment impoundment that are consistent with the water quality regulations. In addition, the SFEIR should examine the feasibility of alternatives to bank-to-bank dredging in the three ponds that would preserve existing BVW (exclusive of *Phragmites* and other invasive species) and bank intact.

The SFEIR should include a water quality monitoring program tailored to each specific subarea of the project. The program proposed in the FEIR relies on a generic approach that appears based on the Charlesgate subarea, which contains some of the cleanest sediments in the corridor and may therefore not represent an appropriate model for other subareas. The SFEIR should also respond to the concerns of DEP and others related to the proposed sediment management plan.

The FEIR proposes dredging of the entire corridor followed by stabilization/restoration work. This construction sequence is likely to cause significant environmental impacts over several

years, particularly if mechanical dredging techniques are widely needed. The SFEIR should investigate alternative construction phasing, with dredging and reconstruction activities completed in geographic subareas prior to work beginning in another subarea.

Stormwater Management/Pollution Control

Based on DEP review, the analysis in the FEIR has not justified the reductions in sedimentation rates and claimed improvements in water quality from the proposed stormwater and pollution control Best management Practices (BMPs). The SFEIR should present more information to justify the conclusions reached, or include appropriate revisions. The SFEIR should also evaluate the potential for increased compliance with the standards for total suspended solid (TSS) removal contained in the DEP Stormwater Management Guidelines. (I recognize that retrofitting the highly urban environment of the project area to achieve full compliance with the 80% TSS removal standard is infeasible, but I believe the target removal rate in the FEIR may be too low.) The SFEIR should evaluate the ability of the proponents to target the largest nonpoint sediment sources from the largest drainage catchments areas for TSS removal and other treatment as appropriate.

With the feasibility of in-stream sedimentation basins in doubt, it is critical that the proposed BMP program remove as much sediment as possible, in order to extend the life of the project as long as possible. The proponents are currently conducting a BMP pilot program to evaluate the effectiveness of various BMPs, although the results of the pilot program were not available for inclusion in the FEIR. The SFEIR should include any results that are available. I note that the final decision to employ specific BMPs is likely to occur after review of the SFEIR. The selection of BMPs is therefore likely to be one of many important questions for the project management to resolve after completion of the MEPA process.

Maintenance and Management Structure

My two immediate predecessors as Secretary have both stressed the need for proper maintenance and management of the Muddy River park system. The 1999 MOU, the 1999 Certificate on the Environmental Notification Form, the 2002 Certificate on the Draft EIR, and the 2002 Charlesgate Phase I waiver decisions dwelled at length upon this issue, and the issue has been of central importance to the project since its inception (Olmsted himself wrote on the importance of the issue). I will not

belabor its importance here, except to reaffirm that I consider maintenance and management as the key to ensuring that the project meets its long-term goals and that the significant public investment in the project is adequately protected. In fact, I view the project itself, with all of its worthy goals, as in effect a deferred maintenance project. As stewards of this park system, we owe it to our constituents and to future generations to ensure that the hard lessons learned on the effects of decades of neglect and improper maintenance are not repeated again.

Given the centrality of this issue to the long-term success of the project, I am disappointed in the discussion of maintenance and management presented in the FEIR. It lacks detail, and is unresponsive to both the requirements of the Draft EIR Certificate and to the requirements of the Charlesgate Phase I waiver decisions. The discussion is also unresponsive to the many specific comments received on the Draft EIR, and to the efforts of the CAC since the publication of the Draft EIR. The management structure trivializes the role of the Maintenance and Management Oversight Committee (MMOC), which I consider an essential part of any successful project management effort. The issue of project maintenance and management requires much work before I can have the confidence that the Commonwealth's investment is protected, and before I am able to make the EOEA Section 61 Findings allowing the transfer of additional state funds.

The SFEIR must present a much fuller discussion of the project management structure, including potential alternative management structures. The FEIR presents little detail on alternative structures and little justification as to why the proponents selected a public-private partnership with the Emerald Necklace Conservancy as the preferred management structure. The SFEIR must present a full discussion of alternative management structures, including the proponent's preferred management structure, the "Rowe cabinet structure," and the structure proposed by the Emerald Necklace CAC and outlined in a memo from the CAC to the proponents dated December 23, 2002. For each alternative, the SFEIR should evaluate how the management structure would work, what the responsibilities of each participant would be, how the structure can advance the project goals, and how the structure can meet the requirements of the MOU and the various Certificates. The discussion should also demonstrate how the proposed management structure would protect the Commonwealth's investment and how the structure would be consistent with EOEA's Section 61 obligations.

The Maintenance and Management Oversight Committee (MMOC) is a necessary component of the project management structure, as mandated in the Charlesgate Final Record of Decision. As stated by my predecessor, the proponents will of course continue to manage the resources under their control, with the flexibility they need to make day-to-day decisions and implement long-term management and operational policies. However, the MMOC provides an important channel for public access to the stewardship decisions being taken in the public's name. Strong public participation through the MMOC will help build and strengthen public support for the project, and ultimately provide for improved stewardship of the resource. The MMOC provides a key assurance of transparency in the maintenance and management decisions affecting the project. The FEIR has all but ignored the important (and legally mandated) role of the MMOC in the project maintenance and management structure (the FEIR does not even name the committee correctly). The SFEIR must specify how each management structure would incorporate the MMOC, and should demonstrate that the structure provides a role to the MMOC commensurate with the level of responsibility and involvement for the committee required by the Charlesgate Phase I decisions. Absent a clear demonstration that the project management structure includes a prominent and appropriate role for the MMOC (and that the proponents are meeting all existing obligations to provide supporting staff to the MMOC), I will not make a Section 61 Finding for the transfer of additional state funds to the proponents.

The maintenance and management structure that emerges from the EIR process will be formalized through a Memorandum of Agreement (MOA) among the proponents, the Metropolitan District Commission (or its successor organization), the Emerald Necklace Conservancy, and other appropriate parties with a formal role in maintenance and management. Whatever the structure selected, the MMOC should also be a signatory to the MOA. The SFEIR should include a Draft MOA that specifies the maintenance and management structure and the roles and responsibilities of the various signatories. The MOA should also broadly outline enforceable performance standards, including commitments to improved stewardship, historic preservation and maintenance of parklands, implementation and maintenance of BMPs, coordination of maintenance activities across jurisdictional boundaries, appropriate staffing commitments, commitments to provide information among all signatories and to the public and EOEA, dispute resolution procedures, and minimum requirements for frequency of top level management meetings.

Maintenance and Management Plan

The Certificate on the Draft EIR required the proponents to develop enforceable maintenance and management commitments. The FEIR contains only a vague discussion of maintenance that falls far short of the requirements in the Certificate on the Draft EIR. The FEIR has also not responded to the specific suggestions made in the DEM comment letter on the Draft EIR (dated April 8, 2002). The SFEIR should include a maintenance and management plan (based on the outline contained in DEM's comment letter) for the park system that includes the following information:

- 1) overall management philosophy and vision
- 2) management, staffing, equipment, tasks, and schedules, with associated costs
- 3) monitoring procedures to assess the continued health and integrity of the project
- 4) measurable performance standards for appropriate resources
- 5) guidelines for preservation maintenance and monitoring
- 6) management structure and coordination
- 7) management policies related to protection and sustainable use of the parks (e.g., vehicular and pet control)
- 8) reporting procedures and enforcement
- 9) training requirements

I recommend that the proponents avail themselves of DEM's expertise in developing maintenance plans appropriate for inclusion in MEPA reviews. DEM has offered assistance in development of the maintenance and management plan. The plan will provide the starting point for subsequent decisions that emerge from the project management structure specified in the SFEIR.

I recognize the fiscal challenges imposed on the proponents by a proper maintenance and management plan. A degree of flexibility may be needed to ensure that long-term maintenance and management of the project receives proper funding through the vagaries of the business cycle, and through the contingent nature of yearly municipal appropriations. To address these concerns, the SFEIR should quantify the amount of resources (human, financial, and other) currently expended on maintenance and management, and how future obligations would increase in response to the requirements of this Certificate and the maintenance and management plan that finally emerges from the continuing review process. The SFEIR should identify any potential deficits

between future maintenance and management needs and anticipated budgets. If shortfalls exist, the SFEIR should consider a plan to fully engage the Emerald Necklace Conservancy (ENC) in a public-private partnership, with ENC using its expertise to raise private funds to offset any deficits.

Historic Resources

Preservation and restoration of the historic resources in the project area are integral parts of the project. The park system is listed on the State and National Registers of Historic Places, and represents an historic legacy worthy of the time and resources spent during the MEPA review to ensure sensitive restoration and appropriate future stewardship. Preservation of the historic resources is also a major goal of the Emerald Necklace Master Plan, which provides the overall context in which the current project is undergoing review.

The fate of the Carlton Street Footbridge (CSF) has been a continuing source of controversy. The Master Plan envisions restoration of this important historic link between the Riverway and the adjacent residential neighborhoods of Brookline. The disposition of the CSF was not originally part of the project currently under MEPA review, but given its documented importance, the Draft EIR Certificate assumed that the Town of Brookline would "...act in good faith to expeditiously implement the elements of the Master Plan within its control, including the rehabilitation and reopening of the Carlton Street Footbridge."

The analysis conducted in the development of the Master Plan and review of the Draft EIR served amply to establish the importance of the restoration of the CSF to the overall project goals, and I hereby reaffirm EOEAs position on the CSF as expressed in earlier decisions. (I note that subsequent to the Draft EIR Certificate, Preservation Massachusetts listed the CSF as one of the ten currently most endangered historic resources in the Commonwealth.) The FEIR presents an uncertain picture of the future of the CSF, which does not give confidence that the Town of Brookline is expeditiously implementing the rehabilitation and reopening of the CSF.

For the reasons outlined above, as part of my decision with respect to project funding, I am requiring that the SFEIR contain enforceable commitments and a timetable for restoration and reopening of the CSF in its current location. I will include such requirements in any Section 61 Finding authorizing transfer of additional EOEAs funds for the project. I will work with the

Town of Brookline and the Massachusetts Historical Commission to identify possible sources of additional funding for the restoration work.

Dirt bike enthusiasts continue to develop, maintain, and operate an unauthorized "dirt bike park" adjacent to the Back Bay Yard and the transit right-of-way. The Certificate on the Draft EIR included a requirement that the proponent determine ownership of the area in question and include plans for restoration of the area if the City of Boston were found to own the parcel. The FEIR reports that the parcel currently used by dirt bikers is partially owned by the City of Boston and partially owned by the Massachusetts Bay Transportation Authority (MBTA). Despite the partial ownership by Boston, the FEIR proposes the continued use of the area (which is partially within the Olmsted system) for the unauthorized dirt bike activities. The discussion in the FEIR runs directly counter to the requirements of the Certificate on the Draft EIR, and in effect sanctions the expropriation of an Olmsted park for use by dirt bikes. I reiterate the requirements of the Draft EIR Certificate relative to this issue, and expect a satisfactory response in the SFEIR.

Rare Species

The Natural Heritage program has indicated its satisfaction with the rare species mitigation presented in the FEIR. The SFEIR need not include additional analysis of this issue, except to the extent that plans for work in areas that provide habitat for rare species change as a result of the additional analysis required elsewhere in this Certificate.

Recreation Impacts

I have received comments from local youth sporting leagues raising concerns with the possible loss of access to Daisy Field while the area is used for construction staging purposes. The SFEIR should investigate whether other sites are available in the area for construction staging, and/or present plans to avoid or minimize disruptions to Daisy Field during the construction process.

Comments

The FEIR has not responded fully and adequately to many of the comments received on the Draft EIR. The FEIR has generated a substantial number of detailed and specific comments from a wide variety of agencies, advocates, and individuals. The SFEIR

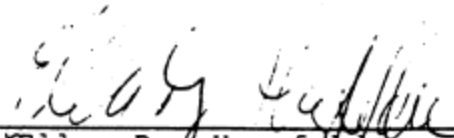
should include responses to the comments received, with a level of detail and analysis appropriate to the comment made. The SFEIR should present additional data or narrative as appropriate to respond to the comments received. The SFEIR should contain an indexed response to comments section that enumerates individual points within comment letters and directs reviewers to the appropriate section of the document where the response is located.

Section 61 Findings/Mitigation

The SFEIR should contain proposed Section 61 Findings for each state agency that must take an Agency Action associated with the project (including EOEA and MWRA, proposed findings for which were not included in the FEIR). The SFEIR should include a summary of all mitigation measures to which the proponent has committed, and include details on funding responsibilities and timetables for implementation.

May 1, 2003

Date


Ellen Roy Herzfelder

Comments received (continues on next page):

02/24/03 John Schemmer
03/28/03 Massachusetts Water Resources Authority
04/01/03 Division of Fisheries and Wildlife
04/03/03 Adaptive Environments
04/23/03 Town of Brookline Conservation Commission
04/23/03 Cathleen Cavell
04/23/03 Brookline Greenspace Alliance
04/24/03 Town of Brookline Park and Recreation Commission
04/24/03 Charles River Watershed Association
04/24/03 Department of Environmental Protection NERO
04/24/03 Sarah Freeman and Sam Sherwood
04/24/03 Friends of the Carlton Street Footbridge
04/24/03 Town of Brookline DPW and City of Boston PRD
04/24/03 Boston Greenspace Alliance
04/24/03 Emerald Necklace Citizens Advisory Committee
04/24/03 Friends of the Muddy River
04/24/03 Department of Environmental Management
04/24/03 Precinct One Town Meeting Members
04/24/03 Medical Academic and Scientific Community Organization
04/24/03 Jamaica Plain Regan Youth league

04/24/03 Friends of Leverett Pond
04/24/03 Hugh Mattison
04/24/03 Muddy River Restoration Project Maintenance and
Management Oversight Committee
04/25/03 Emerald Necklace Conservancy
04/25/03 JP Youth Soccer
04/25/03 Massachusetts Historical Commission
04/25/03 Massachusetts Bay Transportation Authority
04/25/03 City of Boston Redevelopment Authority
04/25/03 City of Boston Environment Department

ERH/ASP/asp

cc: Colonel Thomas Koning, U.S. Army Corps of Engineers