



August 28, 2017

Michael Busby  
Mass Housing Financing Agency  
One Beacon Street  
Boston, MA 02108  
Via email: [MBusby@masshousing.com](mailto:MBusby@masshousing.com)

Re: River Marsh Village MH#916

Dear Mr. Busby:

Thank you for the opportunity to comment on the amended proposal by River Marsh LLC to develop 56 townhouse condominium style housing units at 276 Water Street in Pembroke. While this represents a reduction from the original 68 unit proposal, we saw no attempt to address any of the substantive environmental issues that we provided comment on previously. Specifically, our concerns related to this proposal are the size, intensity and footprint of this development abutting and on top of unique and sensitive wetland resource areas, and endangered species habitat. This environmentally sensitive site should simply not be considered for intensive development.

We are reiterating the same concerns below as we did in the original proposal because nothing has substantially changed with this amended version of the proposal.

This parcel is of regional importance because of its proximity to the North River which has exceptional recreational values and special designation as an environmentally sensitive area. More specifically:

#### **The North River is the Only State Scenic Protected River**

In 1978 the North River Protective Order was passed making the North River the only Scenic Protected River in the state of Massachusetts. The aim of the state [Protective Order](#) is to protect public and private property, wildlife, fresh and saltwater fisheries, and irreplaceable wild, scenic and recreational river resources. The Order protects the North River, as well as parts of associated tributaries in the towns of Scituate, Marshfield, Pembroke, Norwell, Hanover, and Hanson within 300 feet of the banks of the North River and is the only one of its kind. A portion of the proposed 68 unit development lies within the Protected Corridor and all of it directly abuts the Protected Corridor.

#### **The North River is a Federal National Natural Landmark**

In 1977 the North and South Rivers were designated as a National Natural Landmark by the Department of the Interior, as “possessing national significance in illustrating the natural character of the United

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States.” The National Natural Landmarks Program recognizes and encourages the conservation of sites that contain outstanding biological and geological resources. Sites are designated by the Secretary of the Interior for their condition, illustrative character, rarity, diversity, and value to science and education. The National Park Service administers the program and works cooperatively with landowners, managers and partners to promote conservation and appreciation of our nation's natural heritage.

### **Significant State and Local Investments Have Been Made to Save Land Along the North River**

The North and South Rivers Watershed Association, in partnership with the 5 towns that abut the river, local land trust and with state funding support, have worked to protect significant tracts of land along the North River either through purchase of open space or through conservation restrictions on private lands. In the past decade alone over 250 acres of lands abutting the North River have been saved, much of it up and downstream of this proposed development, to create a permanent regional greenway along the North River for the public to enjoy and to protect its unique natural and historic resources. Millions of public tax dollars have been invested to acquire as much property to protect the North River as possible to prevent the kind of ecological damage that this kind of intense development would have.

### **The Property Lies Within Priority Habitat for Endangered Species**

An examination using Massachusetts GIS online mapping of natural resources shows that the majority of property, including the proposed development, lies within mapped Natural Heritage and Endangered Species Priority Habitat (PH 1353 – See attached map).

### **Stormwater and Wastewater Will Directly Impact Wetlands and the North River**

The significant stormwater and wastewater generated from this proposed development will impact the health of the North River and potentially damage its water quality. The proposal, as conceptualized, indicates no effort to decrease the footprint of the development in order to minimize impacts to the sensitive wetland resources on the site. In fact, it maximizes pavement and buildings on every piece of available upland on the site and some wetlands.

Both the wastewater and stormwater treatment systems directly abut sensitive wetland areas adjacent to the North River and FEMA mapped AE Flood Zones. The wastewater treatment system that will treat approximately 15,000 gallons of wastewater per day, requires crossing and filling a wetland and a USGS delineated stream that drains directly into the North River. Sixty-two percent of the site is wetland that directly drains into the North River. It is likely, given the wetlands on site, that the groundwater elevations are high. This will make it potentially challenging to safely infiltrate the high volumes of wastewater and stormwater that this dense development will create without contaminating the water



that drains into the North River. The development is also located in the headwaters of the North River, so contributions from the site could impact the entire North River corridor.

For these reasons and more we believe this is a completely inappropriate site for this dense development. The North River is a unique national, state and regional natural, scenic, cultural and recreational resource enjoyed by thousands of citizens on the South Shore and is worthy of protection. This is truly a special place with unique character and sensitive resources, and is a highly treasured regional asset. The density of the development proposed threatens to undermine the scenic quality, wildlife habitat, water quality, and environmental health of this unique natural resource.

On behalf of the many people on the South Shore who care for this resource and have worked tirelessly to protect it for decades we ask you to deny this proposed project and find it ineligible for development under Chapter 40b.

Sincerely,

Samantha Woods  
Executive Director, North and South Rivers Watershed Association

CC:

Josh Cutler, State Representative  
Judy Grecco, North River Commission  
Ed Thorne, Town Administrator Pembroke  
Paul Jahnige, Mass Dept of Conservation and Recreation  
NSRWA Board of Directors



Map of Natural Resources at 274 Water Street, Pembroke Proposed 40b

