

Town of Nahant  
Open Space and Recreation Plan Committee  
Nahant, MA 01908

Kathleen Theoharides, Secretary  
Attention Erin Flaherty  
Erin.flaherty@mass.gov  
Executive Office of Energy and Environmental Affairs  
100 Cambridge Street, Suite 900  
Boston, MA 02114

Case Number: EEA# 16046

Dear Secretary Theoharides,

As the newly reconstituted Open Space and Recreation Plan Committee for the Town of Nahant, we are pleased to connect with you and your office to contribute our support for preserving and protecting the Open Space at East Point in Nahant, consisting of Canoe Beach, Northeastern University's (NU) Marine Science Center and Henry Cabot Lodge, Jr., Memorial Park (Lodge Park).

This Committee is very concerned about the impact of NU on the open space at East Point. The Town and the University have historically had very good relations and been good neighbors, allowing shared use of East Point to enhance the experience for all. However, issues with NU's stewardship and plans to overdevelop the open space at East Point require regulatory assistance to stop development until all of the key questions are answered and relevant data is assessed.

We strongly urge you to require NU to conduct a full Environmental Impact Report in response to the University's planned development at East Point in Nahant.

Our Committee's charge is to preserve, maintain and enhance quality of life for the citizens of Nahant by developing and maintaining an open space plan. The entire East Point area is zoned as a Natural Resource Protection area, and open space plans have consistently highlighted the importance of protecting this land from development. Town-wide surveys consistently show Lodge Park and Canoe Beach as favorite recreation spots for bathing, walking, sitting, picnicking, photography, painting, stargazing, birdwatching and other recreational pursuits.

Since 1967, NU has left the area of East Point mostly as a wildlife preserve, as they committed to when they acquired the land. According to Mass Audubon Society, East Point is an important area for migrating birds who seek rest and sustenance during migration. It is also an important nesting area for many birds, Snowy Owls, Long Eared Owls, Peregrine Falcons to name a few.

The proposed development would threaten to obstruct vital food sources for migrating and endangered birds.

Nahant residents are also proud of East Point's rich geographic and cultural history, from Precambrian fossils to Native American artifacts to military bunkers from WWII. NU's DEIR is premature and fails to address requests and requirements made of the Secretary in the Certificate. The Secretary stated that the DEIR should "identify and describe historic resources, project alternatives and identify measures to avoid, minimize and mitigate impacts to the resources" and that "[t]he Proponent should consult with MHC [Massachusetts Historical Commission] regarding information that can be presented in the DEIR regarding archeological resources." NU, however, concedes that it has not yet engaged in the required consultation with MHC and, in fact has only just submitted its archeological permit application to MHC on October 22, 2019. See DEIR at 5-1. NEU admits that Historic Resources, including potentially archeologically sensitive resources have not yet been determined and will only "be determined in consultation with the [Massachusetts Historical Commission] and presented in the [Final Environmental Report]". Id. at 9-3.

While we don't know for sure if the current proposed development would disturb or destroy significant fossils or artifacts, we do know that it will disturb and destroy a habitat for wildlife and a serene, contemplative nature environment for residents. Even after demolition and construction is completed, and new trees grow, the new proposed structure would diminish the spectacular views, and the increased levels of light, noise and activity will detract from the experience of the natural environment for wildlife and people alike.

The campus population is expected to double from 114 to 228 (staff and students) and so is the traffic, however, parking expected to quintuple from 26 to 121 cars. NU has not answered questions accounting for these increases. What stormwater management structures are presently used to mitigate stormwater runoff from impervious areas on the property? How will runoff from additional 80,650 sf be managed and treated? The NPC/DEIR does not provide a Coastal Management Plan which was requested to be included in the DEIR by the Secretary.

How will appropriately-sized drilling rigs be transported and positioned to install deep geothermal wells on the east side of the existing bunker? How much of the land on the east side of the bunker will be developed or altered to accommodate the rigs and any future activity at the site? NU has also left these questions unanswered. NU's DEIR contains numerous instances of incorrect information and displays a blatant disregard for the overall environmental issues of large scale development in a designated Natural Resource Area. This project affects 20 some acres of already fragile coastal lands and wetlands.

NU has demonstrated that their research-based attempts to preserve and protect Canoe Beach have been not successful and have actually made the situation even worse. MEPA must require determine that solutions to the stability of Canoe Beach be included in the FEIR. NEU should not be allowed to segment off Canoe Beach by ignoring the climate change issues it entails.

NEU should not be allowed to segment off yet another component - the seawater intake system - though a Phase I Waiver when, as NU concedes, there has been no material change to the project and the MEPA Office has previously indicated that the seawater intake system upgrade should be studied and evaluated in conjunction with any new major building by NU at East Point. They have built sea water exchange projects that have been shown to have an adverse impact on the coastal waters surrounding East Point.

NU's poor record on protecting its own environment is apparent at first glance at the campus. Cars are parked on wetlands, shopping mall landscaping replaces native plants, vegetal wetlands are stages for equipment and facility vehicles. The security guard's car idles around the clock just yards away from the ocean.

The filing states that majority of the work presently performed by the laboratory involves no manipulation of water properties with the exception of elevating water temperatures for "isolated" experiments. However, the ENF also states that under proposed conditions the investigations will involve "environmental genomics, bioinformatics, climate sensing and modeling". The filing should make clear to what degree any future gene sequencing experiments will impact the discharge to the ocean and if there is any potential of release of genetic material or new biota to the environment. Also, what potential reagents and laboratory chemicals will be introduced to the water discharged to Canoe Beach? The organisms that will be subject of experiments must also be fed and kept in aquaria. Therefore, the FEIR should indicate what concentrations of nutrients, excess food and metabolic waste will be discharged to Bathing Beach Cove and whether there will be any runoffs or any other impacts to Canoe Beach?

The multiple concerns and questions described above and still countless others are why an EIR must be required. To be responsible stewards of our most cherished open spaces, and to protect them as important places for residents to enjoy and relax in nature, we must ensure that all questions about current and future stewardship and plans are answered. We thank you for helping to protect this vital open space and we request that you require NU to continue to study the cumulative effects of all projects contemplated in this sensitive location in the Final Environmental Impact Report.

Sincerely,

Paula Devereaux, Chair, Open Space and Recreation Master Plan Committee  
Dana Sheehan, Vice Chair, Open Space and Recreation Master Plan Committee  
Margaret Alexander, Recorder, Open Space and Recreation Master Plan Committee  
Ellen Antrim, Member, Open Space and Recreation Master Plan Committee