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July 23, 2019

BY ELECTRONIC MAIL AND FIRST CLASS MAIL

Kathleen Theoharides, Secretary
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, Erin Flaherty
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: Northeastern University Coastal Sustainability Institute; EEA No. 16046

Dear Secretary Theoharides:

The Town of Nahant ("Town") appreciates the ability to comment on the Environmental Notification Form ("ENF") filed by Northeastern University ("NEU") for the proposed Coastal Sustainability Institute project on the NEU Marine Science Center ("MSC") campus in Nahant (the "Project"). The Town respectfully requests the Secretary consider implementing an EIR as we are concerned about impacts of the Project, including but not limited to, damage to the Town's valuable infrastructure, adverse impacts on a potentially archeological significant site, and the potential improper segmentation of a beach restoration project on the property.

In January of 2018, NEU filed an ENF, intending to upgrade its seawater intake system to 2,400 gpm (EEA# 15793). This ENF was withdrawn. Additionally, in 2018, NEU completed a study, funded by a Coastal Resiliency Grant from Massachusetts Office of Coastal Zone Management (CZM), of a proposed cobble berm construction project at Canoe Beach, which abuts the buildings/bunkers on the Property. NEU conducted that study in consultation with CZM, MEPA and DEP.

The current ENF describes the Project as a new 55,000 sf building on top of the existing Murphy Bunker, new parking lots, constructing a new pump house and redesigning the current seawater intake system to increase its capacity (the intake and effluence will increase from an average of 291 gpm to 600 gpm).

First and foremost, Nahant is the smallest town in the Commonwealth by land area at just 1 square mile. We are primarily a residential neighborhood and our tax base is made up of roughly 95% residential property taxes. Many of the homes in Nahant were built as seasonal

cottage type structures and the infrastructure was built to support them. Most of our infrastructure, including our utilities, roadways, coastal protections and town buildings are reaching their life expectancy and are in need of repair or replacement. Nahant has never experienced a development similar to the size or potential impact of the Project proposed by NEU.

The Town is concerned about our infrastructure being able to support the impacts of the proposed Project. Sewer lines, water lines and roads are valuable assets and are threatened by the construction of the Project and are not considered through the ENF. The increased volume of sewerage documented in the ENF has been reviewed by our sewer pump station operation and maintenance contractor. They have recommended an increase in 2 of the 3 force pumps in order to provide additional capacity. Furthermore, the force main pipe from Wharf Street to Ward Road and the force main pipe from Ward Road to Lynn Water and Sewer Treatment Plan are known to need significant repairs or replacement. Over the last several years, the Town has experienced multiple breaks and emergency repairs on the force main, one of which cost roughly \$1.2 million.

Last year the Town hired a consultant to prepare a 5-year paving plan. Their assessment determined that many of the Town roads were in desperate need of repair. Specifically, the current backlog of outstanding repairs as of January 2019 is \$1,485,092. The Town is concerned about the impact of construction vehicles on our already damaged roadways and once the Project is constructed, traffic is expected to double. If that impact leads to a shortened life expectancy of our roadways, the Town may have difficulty keeping up with the costs of repairs.

Additionally, the coastal bank at 40 Steps Beach has experienced significant erosion from past winter storms. Nahant Road, the main thoroughfare to MSC, is above this coastal bank and major utilities reside beneath it. The Town believes it is crucial to restore the coastal bank because of concerns for further erosion and potential failure leading to our infrastructure becoming compromised. The Town has been informed that the cost of a coastal bank restoration project at 40 Steps Beach is between \$300,000 and \$1 million dependent on the design.

The Project involves the installation of two new 14-inch diameter HDPE intake pipes that will replace the two existing 6-inch diameter HDPE pipes. The new intake pipes will extend out approximately 400 feet from the seawall at Bathing Beach. The intake pipes will be installed using horizontal directional drill below the seawall and under the beach to a location just seaward of the mean low water elevation. However, the Town is concerned with the size of the piping as the pipes appear to be oversized for the proposed intake of 600 gpm and are capable of supporting a 2,400 gpm intake system. Also, while NEU publically claims that the proposed intake system will be limited to 600 gpm, submittals associated with the ENF reveal that NEU modeled up to a 2,400 gpm intake system. Therefore, the Town requests that this data be updated if the intake system increases. Secondly, NEU previously updated its intake system to the current intake system and was required to remove the older intake system which was not done to completion. Therefore, the Town notes that NEU should be required to submit a plan to completely remove the older intake system and the current intake system with full restoration after installing the new proposed intake system.

NEU proposes to partially demolish and then partially obscure Murphy Bunker in order to connect it to the 55,000 sf building that would be built on top of the bunker. The Murphy Bunker is on the Inventory of Historic and Archeological Assets of the Commonwealth (specifically the gun batteries of Murphy Bunker. See NAH.910, NH.935). Additionally, the Massachusetts Historical Commission (“MHC”) has determined in a comment letter dated July 19, 2019 that the proposed project will have an “adverse effect” on both the Murphy Bunker and Fort Ruckman North due to the proposed physical destruction and alteration of these historic properties. NEU has not provided any construction plans for this aspect of the project, so the extent and process of the partial demolition is unknown. At a minimum it has been disclosed that an elevator would be built through the bunker. It is unknown how construction will take place and what mitigating measures are being proposed to protect and preserve the historically significant structure. The Town supports MHC’s request that an intensive archaeological survey and cultural resources survey be conducted.

Additionally, the historical records indicate that Nahant, including East Point, was inhabited by and used by Native Americans for hundreds of years. NEU has not provided its plans for its expansive geothermal wellfield, which is estimated to cover 5+ acres. As stated above, the scale of this aspect of the Project warrants further review regarding its potential archeological significance. Further, as the property is a former military base, the Town is concerned about soil contamination and remediation. The Town is not aware of any testing being conducted to determine if remediation is required. Said testing should be required to limit negative impacts from disturbing potentially contaminated soil.

Finally, the Town has been made aware that the ENF may not consider the entirety of the Project, specifically any future restoration work on Canoe Beach. The inclusion of a Canoe Beach restoration project in the ENF may trigger a mandatory EIR. Therefore the Town is concerned about a potential Canoe Beach restoration project not being included in the ENF, especially if it has any link to the proposed Project. We encourage MEPA to investigate the connection between a potential Canoe Beach restoration project and the proposed Project. Also we ask that MEPA make a determination as to if the potential Canoe Beach restoration project should be included in this ENF.

As described above, concerns are well founded regarding the Project and therefore, the Town respectfully requests that the Secretary consider implementing an EIR scope that will adequately address the impact and mitigation issues detailed above.

Sincerely,

Town of Nahant Board of Selectmen,
By.



Antonio Barletta, Town Administrator