



*Samantha Woods  
Executive Director*

August 11, 2009

Secretary Ian A. Bowles  
Executive Office of Energy and Environmental Affairs  
Leverett Saltonstall Building, Suite 990  
Boston, MA 02114  
Attn. via e-mail to [purvi.patel@ma.state.us](mailto:purvi.patel@ma.state.us)

Re: Environmental Notification Form (EEA #14455)  
Town of Norwell Cemetery  
Stetson Shrine Lane  
Norwell, Massachusetts

Dear Secretary Bowles,

The North and South Rivers Watershed Association (NSRWA) would like to take this opportunity to provide comments on the ENF for the Town of Norwell Cemetery project proposed on Stetson Shrine Lane in Norwell MA. The NSRWA is a nonprofit established in 1970 and represents approximately 2400 individuals who support our mission to protect the watershed and rivers.

The proposed project site is located on property that abuts the North River. The North River is the only Scenic Protected River in State of Massachusetts and it is a National Natural Landmark designated by the National Park Service. As such the North and South Rivers Watershed Association and the towns that abut the river have spent considerable effort and money to permanently protect as much acreage along the North River as possible in order to protect its ecological integrity as well as its scenic beauty. The town of Norwell conveyed 120 acres of the 144 acre Stetson Meadow property in 1988 to the Conservation Commission for protection. The town of Norwell's Master and Open Space plans clearly identifies this area as already protected.

The ENF states that the project site is 42.92 acres and lies within a NHESP Priority Habitat of Rare Species and Estimated Habitat of Rare Wildlife. The town of Norwell's town meeting in 2007 designated 20 acres of Stetson Meadows property of the total 144 acres for this project.

**The North & South Rivers Watershed Association Inc.**  
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The remainder of the property being offered as mitigation (approximately 23 acres) for the impacts to rare wildlife habitat is presumably already protected as it is in the care and custody of Norwell's Conservation Commission. Whether the additional acreage sited in the ENF can also be considered mitigation for this project would seem questionable.

The North River, like so many of the Commonwealth's waterbodies, does not meet its Clean Water Act uses after rain events. Polluted stormwater runoff is the reason our shellfish beds cannot be harvested and that the river is sometimes not safe for swimming and boating after rain events. We hope the town can help lead the way by example by adopting the use of more innovative approaches in dealing with stormwater. We would also ask that the proponent consider using low impact development techniques such as minimizing paving and using alternative pavements such as porous pavement or permeable pavers to prevent additional stormwater from being generated. Given the relatively low vehicle traffic anticipated at the site we think these kinds of alternatives would be very viable. Where stormwater is unavoidably generated it should be treated and conveyed in a decentralized manner using grassed swales and bioretention basins (rain gardens) as these treat for bacteria and help to replenish our groundwater.

We would also encourage the proponent to keep or plant as many trees and other native vegetation and soils as possible and to minimize or completely avoid the use of pesticides or fertilizers in the maintenance of this area.

Sincerely,

Samantha Woods  
Executive Director