

October 22, 2018

Jessica Malcolm, Planning and Programs
Massachusetts Housing Finance Agency (MassHousing)
One Beacon Street
Boston, MA 02108

Re: MH ID No. 1005; 40B 57 Perkins Row, Topsfield

Dear Ms. Malcolm:

On behalf of Mass Audubon, I submit the following comments on the proposed Perkins Landing LLC project at 57 Perkins Row. We request that these comments be considered in relation to MassHousing's review of the application of site approval and the Town of Topsfield's review for a comprehensive permit pursuant to Chapter 40B. The proposal involves 28 units on 8 acres of land bordering the Ipswich River and Mass Audubon's adjacent Ipswich River Wildlife Sanctuary. There are significant concerns regarding this project in relation to impacts on the river and associated wetlands and water resources. Mass Audubon recognizes the pressing need for affordable housing. At the same time, it is important that high-density developments be sited in appropriate locations where sufficient infrastructure is available and designed in a manner that will not unduly impact sensitive natural resources.

The project site abuts Mass Audubon's Ipswich River Wildlife Sanctuary, which encompasses nearly 2,000 acres. Eight miles of the main stem of the Ipswich River flows through the sanctuary. The river is bordered by extensive wetlands including silver maple floodplain forest, shrub swamp, wet meadows, cattail marshes, and other wetland types. Several river islands are also located on the sanctuary providing important upland habitat within the wetland matrix. The silver maple forest along the river adjacent to the project site is an unusual and increasingly rare natural community type. The dense vegetation in the area makes this one of the few rivers in eastern Massachusetts where canoeists can travel by day or moonlight and not see development or artificial lights. In addition to the important and diverse habitats supported by the river and its associated wetlands, the Ipswich River basin provides public water supplies to 14 communities. The Ipswich River is one of the most flow-depleted river basins in Massachusetts, with water withdrawals reducing flows in the river as well as groundwater levels and therefore base flow to the river. Mass Audubon's property both protects the public water supply sources and is impacted by water withdrawals. Efforts are also underway to restore coldwater fishery habitat within the Ipswich River. In this context, it is vitally important that any development in proximity to the river is designed to maintain the infiltration capacity of the land and prevent degradation of either water quality or quantity.

The subject property includes approximately 700 feet of frontage on the Ipswich River as well as close proximity to wetlands. As depicted on the plans, 10 of the proposed homes are within the 100-foot wetland buffer and just outside of the 200-foot riverfront area, and the proposed access road also passes directly adjacent to bordering wetlands. This presents significant concerns about the impacts associated with the proposed loss of natural vegetation and the capacity of the land to absorb precipitation and provide clean infiltration and runoff back into the riverine system. Mass Audubon is also concerned about the impacts on the habitat and scenic integrity of the river associated with such dense development and associated land clearing, structures, and lighting.

Riverfront and Wetlands Delineation

The location of wetlands and Riverfront Area subject to the Wetlands Protection Act need to be reviewed and confirmed by the Conservation Commission. The actual Mean Annual High Water Line may be higher than depicted on the plans, due to a flow restriction just downstream of the project site. Proper location of these resource areas is important to determine which areas are actually potentially buildable.

Stormwater and Low Impact Development

Projects in this sensitive location need to be designed to maintain natural vegetation and the capacity of the land to absorb, filter, and infiltrate precipitation. Low Impact Development design principles should be applied, including the retention of as much natural vegetation as possible and the direction of rooftop and driveway runoff into soils and vegetation. Impervious surfaces should be minimized, and any landscaped areas should rely as much as possible on native plants that do not require artificial irrigation.

We request that MassHousing and local officials carefully review this project, and require third-party review for wetlands and stormwater analyses. Any project approved at this site must amply demonstrate that it will be designed and maintained so as not to impact water quality and quantity or wildlife habitat functionality in the river, wetlands, or Riverfront Area; and will be compatible with the neighborhood in the Perkins Row community.

Sincerely,



Amy Weidensaul
Sanctuary Director

Donna Rich, Topsfield Community Development Coordinator
Robert Moriarty, Chair, Topsfield Zoning Board of Appeals
Martha Morrison, Chair, Topsfield Planning Board
Heidi Gaffney, Conservation Administrator, Topsfield Conservation Commission