



Nantucket Land Council, Inc.

Six Ash Lane
Post Office Box 502
Nantucket, Massachusetts 02554
508 228-2818
Fax 508 228-6456
nlc@nantucketlandcouncil.org
www.nantucketlandcouncil.org

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Rick Atherton, Chairman
Nantucket Board of Selectmen
16 Broad Street
Nantucket, MA 02554

Dear Chairman Atherton,

Thank you for the opportunity to provide comments regarding the Nantucket Cottage Hospital's proposal to acquire approximately 21 acres of land from the Town of Nantucket in Wyer's Valley. The Nantucket Land Council is an environmental non-profit who for the past 40 years has advocated for the protection of the water resources on Nantucket.

As you know, the hospital is seeking the Wyer's Valley land to build a new facility. We have no position on whether a new hospital is warranted. Our concerns are strictly focused on the proposal's impact to the natural resources of the Wyer's Valley site. The Land Council has serious concerns that a development in such close proximity to the public well field poses an unacceptable level of risk to the long term viability of our water supply.

The Land Council has engaged Horsley Witten to review the proposal and provide comments throughout the public review process. We encourage the Board of Selectmen and the Wannacomet Water Commission that before any decision is made to proceed, that the Hospital provide an entire site review explaining in detail the entire development, stormwater infrastructure, medical waster disposal, oil and gas deliveries, and anything else that may threaten groundwater quality. There is also no detail on what the potential expansion sites will contain which are even closer to the proposed new wells and existing deep well. We look to both boards to exercise due diligence and give this project the high level of scrutiny that it deserves.

Although the only plans that we have seen is a site plan overlay presented to the Board at its July 23rd meeting, we understand that the Hospital is engineering the development to incorporate Best Management Practices



and appropriate stormwater infrastructure. As you will see on the plan the proposal includes not only the creation of the largest parking lot on the island, but the largest one in proximity to the well field. It is important to note that the Hospital can not guarantee 100 percent, that the development and its associated uses will not have an impact. It is simply impossible to do so. It is our job, and yours, to assess the level of risk, and determine if it is worth proceeding. At this time, we feel that the potential environmental cost of contaminating the water supply is too extreme to justify the potential benefits of the development.

I had the opportunity to meet with Robert Gardner of the water company to explain the new well that they are planning on drilling regardless of whether the hospital deal goes through. The Land Council supports the abandonment of the multiple shallow wells and the drilling of a deeper well of approximately 80 feet. However, even though the situation will be improved, this does not negate the increased risk that a new hospital will bring. The aquifer in the valley is fairly shallow, approximately 10 feet below the ground. An 80 foot well will still be drawing water that is hydrologically connected to the water close to the surface. This shallow nature of the aquifer heightens the level of associated contamination risk.

The Wellhead Recharge Zone is broken up into Zone 1 and Zone 2, with the Zone 1 being the more prohibitive area. As Mr. Gardner can attest to, the Zone 1 water protection area is a fairly arbitrary line that is set through State regulatory process. Although I agree that having the Zone 1 in place is important, just the simple fact that a certain use is prohibited inside the Zone 1 but would be allowed merely one inch over the line, suggests that the inherent contamination risk is not to take lightly. Since the activities proposed are outside the Zone 1 area, the future permitting process is fairly standard and will follow the traditional path that proposed activities in the Zone 2 area undergo. The time for assessing the environmental risks and mitigation standards is during this stage of the discussion. The Town owns the property and we look to our Town leaders to protect the water supply to the best of their ability.

When applying an environmental cost benefit analysis, it is also important to analyze any other site alternatives that may be suitable for the proposed use. During the Board of Selectmen meeting on July 23rd Hospital representatives presented their review of the various potential sites. I was somewhat confused by the reasoning for dismissing two sites in particular. The first includes the existing site and a portion of the adjacent park. The main reason for not using this site was a statement that the building would look inappropriate to the surrounding area. It appears that there is clearly enough room for the development and the construction staging and that building design would follow the regular Historic District Commission review process. The second site is the "Glowacki Pit" now owned by Richmond Development Group. This site appears to present ideal redevelopment potential suitable for the hospital use. Again, there did not appear to be much substantial evidence presented to dismiss this alternative site. When considering the potential impacts to our water supply, it is critical to look at alternative sites that would decrease the potential threats.

We look forward to participating in the future and hope that a high level of review and discussion takes place over the coming year. We will provide further comments as details of the proposal are made more available.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cormac Collier', written in a cursive style.

Cormac Collier
Executive Director
Nantucket Land Council, Inc.

cc Robert Gardner, Wannacomet Water Company