



Vineyard Conservation Society

CONNECT PROTECT REFLECT

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October 20, 2022

Re: DRI #720 MV Hospital – Navigator Homes

Dear Commissioners,

The Vineyard Conservation Society (VCS) is a 57-year-old local advocacy organization tasked with protecting the environment of Martha's Vineyard. Based on our review of the applicant's submission, VCS wishes to flag several concerns and to offer corresponding suggestions for mitigating the environmental impact of the project.

1. Priority Habitat. It is the position of VCS that no new development should occur in Priority Habitat (PH), as designated pursuant to the MA Endangered Species Act. The present proposal simply leads to too much disturbance of PH in our view. (*Context: A formal policy to that effect was recently approved by our board, and we have urged the Housing Bank Review Committee to incorporate this goal into their proposed legislation.*)
2. Light pollution. Because the PH designation at this site is based on the occurrence of light-sensitive invertebrate species, impacts from artificial lighting deserve special scrutiny.
3. Nitrogen. The project necessarily involves a large amount of clearing and site work. Preserving habitat is the most sustainable approach to mitigating nitrogen impacts on our coastal ponds because naturally-functioning ecosystems process nitrogen from all sources: wastewater, fertilizer, and atmospheric deposition.

To address these issues, VCS offers for your consideration the following directions for conditioning approval of the DRI:

1. Reduce the building envelope such that it does not encroach on PH.
2. Commit to periodic ecological monitoring of the property (critically, but not necessarily limited to, the PH areas) for state-listed species and reporting of findings to the state Natural Heritage and Endangered Species Program. This could be accomplished by setting aside funding for an independent contractor or nonprofit organization.
3. Ensure that all outdoor lighting is truly necessary for the safety of residents, and that it is shielded, downward-facing, low color temperature, and no brighter than needed.

4. Require screening vegetation where vehicle headlights will be directed toward natural habitat.
5. Commit to using no fertilizers for lawn and landscaped areas (excepting an initial application at seeding/transplanting time), beyond an annual topdressing with compost. Similarly, commit to no use of pesticides and herbicides.
6. More broadly, the Navigator Homes community presents an ideal situation to put the “Vineyard Lawn” concept into practice, i.e. minimizing lawn area in favor of native plantings, and selecting grass varieties that are not reliant on watering and chemical inputs.

VCS believes that conditions based on the above considerations would help mitigate the project’s environmental impact, and advance long-term sustainability. Thank you for the opportunity to comment.

Sincerely,

Brendan O’Neill
Executive Director