*9/21/2023 — for posting on Town website*

To: Ann Harrison, Chair, Select Board

Ron Mastrogiacomo, Chair, Planning Board

Jack E.Burke, Jr., Chair, Community Preservation Committee

Peter Colarusso, Chair, Board of Health

Sarah Mellish, Chair, Finance Committee

Alison Anholt-White, Chair, Sustainability Committee

From: Steve Gang, chair, Conservation Commission; Co-chair, Open Space & Recreation Committee; Olga Hayes, Co-chair, Open Space & Recreation Committee, and Helen Bethell, Open Space committee and former Conservation Commission chair

Re: Protection for Drinking Water from Gravelly and Round Ponds

Protecting the quality of Manchester’s drinking water has been a key concern for the Open Space & Recreation Committee since its creation in the 1980s. Every state-mandated open space plan the committee has produced — from the first in 1988 to the most recent in 2022 — has called for conservation of the undeveloped woodlands in the watersheds for Manchester’s public water supplies. This is universally recognized as the most effective means of safeguarding water quality.

We are particularly concerned about the watershed for Gravelly and Round Ponds. Manchester’s control over this watershed is slim. Only a third of it is within the town – the remainder is in Wenham, Hamilton, and Beverly, and includes Gordon College’s highly developed campus in Wenham.

In Manchester, the watershed is limited to the Western Woods south of Route 128 and the more than 110 acres of woodland north of the highway owned by Gordon College. The latter woodland directly abuts Manchester’s water supply in Hamilton. Surface water and groundwater flow northerly through this parcel to Round and Gravelly Ponds.

As the Gordon College woodland is zoned for limited commercial use, its development appears attractive as a source of much-needed revenue. The Water Resource Protection Overlay Districts, created as a result of the Horsley Witten study in 1990, limit potentially damaging projects but do not completely protect this sensitive area.

To help the Town understand the situation more fully, we have gathered all the pertinent information available about the Gordon College woodland — its topography, soils, hydrology, outstanding environmental features, professional assessments of developability, and the history of development attempts. In addition to water-quality protection, the Commonwealth’s Natural Heritage Program found the area to be habitat for species of critical conservation concern.

Especially revealing was a preliminary site evaluation study done for New England Biolabs in 1997. Biolabs was considering moving its headquarters to the Gordon College woodland in Manchester. The planned move would have supported an Essex County Greenbelt initiative aimed at conserving all the Gordon College woodlands in Hamilton and Manchester, save for Biolabs’ headquarters site.

Biolabs was to contribute $1 million to the Greenbelt initiative. In exchange it would get space for two two-story, 20,000-sq. ft. buildings. However, the combination of difficult topography and state wetland regulations made it impossible for Biolabs to locate a suitable site, and the company withdrew from the project.

The problem was **mainly topography**. The preliminary site evaluation found that

Of the total 110+/- acres on site, there are 80+/- acres of upland and 30+/- acres of wetland. The wetland areas are situated such that they divide the upland into five smaller partially connected ‘peninsulas’ ranging in size from 7+/- acres to 30+/- acres. **This landscaping feature may have the greatest impact on the development of this property.** [emphasis added]

 The preliminary site evaluation also found elevations ranging “from a high point of 136 NGVD the southeast portion of the site to a low elevation of 50 NGVD throughout the wetland areas.”

Biolabs’ inability to find an appropriate site for its needs was not the first time a sizable corporation had given up on the Gordon College woodlands. Earlier in the 1990s, Christian Book Distributors had proposed a mail-order warehouse but had withdrawn its application after a closer examination of the site. Together these withdrawals suggest that no large corporation would be likely to try again. And none has.

It may be possible, however, that a small section of the Gordon College woodlands could be found to support a company that did not expect to require additional space.

For this reason, the Open Space & Recreation Committee recommends that the Town seek to obtain a conservation restriction on the Gordon College woodlands. Full ownership by the Town would be expensive, and is neither needed nor desirable. The Commonwealth would cover 50-60% of the cost of a conservation restriction. We can expect financial help from MECT. The cost to the Town would be relatively low for the recognition and protection that would be achieved.

­­The College has given every indication that it wants to maximize its income from the property, but the outlook for a big sale is not favorable. Sale of a conservation restriction is likely to yield the most cash any sale could hope to achieve. Meanwhile, retaining ownership gives the College the opportunity to use the woodlands for academic purposes. They could constitute an ideal laboratory for the Ecology and Conservation Concentration program the College already offers, and the basis for expanded programs. The Town and MECT could offer to assist the College in seeking Commonwealth and foundation grants in support of shared educational and research goals.

We appreciate that the College may initially reject such an offer, clinging to the hope that the woodland’s poor topography can somehow be overcome. Without evidence to the contrary, we must remain firm, though willing to change our position if circumstances change. Meanwhile, we can concentrate on assuring that the environmental restrictions on development in such a sensitive site are as thorough as possible.

We urge the Select Board, the Planning Board, the Board of Health, and the Finance Committee to join us in advocating for a conservation restriction on the Gordon College woodlands in Manchester. We would be happy to send a representative to one of your meetings to discuss this further. If the Select Board would like the Sustainability Committee to host the discussion, we suggest they appoint one member of each land-use board, committee, or commission, as the case may be, to serve as an ad hoc member of the Sustainability Committee.

Attachments:

Maps:

 Assessors map ofGordonCollege woodlands in Manchester

 Topo map of Gordon College woodlands in Manchester

 Water resource protection district for Gravelly and Round Ponds

 DEP Zone 2 Wellhead Protection Area for Gravelly and Round Ponds

 Rare Species Habitat

 Species of Conservation Concern

 Biomap2 Core Habitat

 Manchester/Essex Ecological Resources

 Rimmer Environmental Consulting, LLC, Pine Street, Manchester, MA

 Wood Frog-Mole Salamander Egg Mass Survey, April 13, 2010 and April 21, 2011

Texts:

 Biomap2 — Manchester

 Preliminary site evaluation prepared for New England Biolabs, report 1997

Gordon College, “Ecology and Conservation Concentration” (from website)