



October 26, 2020

Weymouth Conservation Commission
75 Middle Street
Weymouth, MA 02189

Dear Members of Weymouth Conservation Commission & Mary Ellen Schloss, Administrator,

As president of the Back River Watershed Association I am submitting our deep concerns regarding the proposed project of Lovell Field Pedestrian Foot Bridge as described in the Notice of Intent and the impacts to Weymouth Herring Run which is a critical ecological system.

The Back River was designed an Area of Critical Environmental Concern (ACEC) in 1982 in compliance with ACEC Regulations [301 CMR 12.00]. The ACEC program was established in 1975 when the Massachusetts Legislature authorized and directed the Secretary of Environmental Affairs to identify and designate areas of critical environmental concern to the Commonwealth and to develop policies for their acquisition, protection, and use. The Back River Committee of Weymouth and Hingham prepared the nomination of Weymouth Back River with the support of citizens and the communities of Weymouth and Hingham. This process involved extensive public input, outreach, and community meetings to review and identify local and regional goals for resource management of the area. The nomination itself described the area's natural and cultural resources and their ecological relationships. It further outlined potential benefits of and reasons for designation, identified goals and objectives for stewardship, the process of public education and proposed a potential ACEC boundary to the Secretary for public review.

Our ACEC designation for the Back River recognizes its significant ecosystems and is intended to foster appreciation and stewardship of the unique natural and cultural resources of the area. Projects within its boundaries are subject to state agency jurisdiction or regulation. More importantly, projects initiated by an agency, require a state permit, or are funded by a state agency are reviewed with closer scrutiny to avoid or minimize adverse environmental impacts. The ACEC designation provides a framework for citizens, communities, and agencies to work together and ensure the long-term preservation and management of these areas.

ACEC maps are intended to be used with the written boundary description contained in the ACEC designation document. The mapped boundary is not to be used by itself for definitive ACEC boundary delineation or regulatory interpretation. For review of site-specific projects in or bordering the ACEC, determinations must be made in the field by a certified professional in consultation with appropriate Conservation Commission[s] and ACEC Program Staff.

The Back River Watershed Association is a 501(c) (3) tax exempt organization organized to preserve, protect, and promote the Back River and its watershed in Weymouth, Hingham, and parts of Abington, Rockland & Braintree.

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The Herring Brook is designated as an Outstanding Resource Water, is part of Back River Area of Critical Environmental Concern, and is a significant part of Weymouth's Natural Heritage. It is one of the state's largest most productive herring runs and part of Weymouth's history earliest records of 1648. The proposed bridge construction spanning the Herring Run fishway is sited at one of its most fragile and sensitive areas of the Herring Run. Portions of the proposed bridge site are located within the ACEC and the proposed staging area for heavy equipment is inside the buffer zone, which needs to be protected from harm. We strongly believe the buffer zone must not be breached.

Furthermore, we believe construction in the buffer zone and Riverfront threatens the stability of the riverbank with the removal of over 50 trees. Removal of the trees or any part of the canopy negatively impacts many species of birds, some of which are rare species listed as protected with the state. The loss of habitat where these birds feed, nest and roost in the river flyway need space. The bridge will interfere and these species and could leave the area. The wooded area must remain intact or the predation activity will change as seagulls replace the osprey which are now thriving in this area.

The recently published *The Ecology of Weymouth Back River* contains valuable information regarding the estuarine wildlife, aquatic life and in particular discusses the importance of the fish runs including river herring as the keystone species restoring collapsed and depleted fish stocks throughout the Gulf of Maine. The proposed lighting on the path and bridge, while necessary for public safety, will be detrimental as herring and birds need dark conditions at night. We also have questions regarding the soil conditions and would like to know the results of the test borings. Public safety is also a concern since there has been a history of drug and alcohol activity in this area for years. The bridge could bring more of those problems and increase trash and debris or cause other issues detrimental to the herring. In addition to these concerns the plastic infill green pellets will end up in the Herring Run. from the Lovell Field onto the bridge being tracked by the footwear of the athletes, and visitors.

As an organization we are in opposition of the proposed Lovell Field Pedestrian Foot Bridge and sincerely hope a more suitable alternative plan can be developed. We must protect our natural resources and not undertake any project that might jeopardize future of the Weymouth Herring Run.

Respectfully,



Linda J. DiAngelo

Enclosure:
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