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*Executive Director*

March 5, 2012

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Cape Cod Commission  
P.O. Box 226  
Barnstable, Ma 02630

Attention: Andrea Adams

Subject: MP Renaissance Development of Regional Impact

Dear Members of the Cape Cod Commission:

The Association to Preserve Cape Cod (APCC), the Cape's nonprofit environmental advocacy and education organization, has reviewed the MP Renaissance Development of Regional Impact (DRI) project proposal, including information provided in the February 21, 2012 Cape Cod Commission staff report and at the February 28, 2012 public hearing, and submits the following comments.

The proposed project has been refiled as a DRI by the applicant with a reduction in size from the previous DRI filing. The current project is described as a 132-unit assisted living/memory care facility to be housed in a new 131,877 square foot building with parking, located on 22.5 acres in Brewster. The revised project will consist of a development envelope of 8.01 acres.

In its review of the project, APCC has identified the following concerns:

**Greenfield Development:** APCC supports directing development and redevelopment projects to designated growth centers, such as Economic Centers, Industrial Service Trade Areas and Village Centers as defined in the Regional Policy Plan (RPP), and believes development on undeveloped greenfield sites outside of those designated centers should be strongly discouraged. The MP Renaissance project is proposed on 22.5 acres of undeveloped woodland located outside of a designated growth center. A development of the size and intensity of use as the MP Renaissance project would be more appropriately located in an area where it could take advantage of existing infrastructure and services.

**Groundwater Quality:** Assurances must be made that the project will not have any wastewater-related impacts on the two private wells that supply water to

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the neighboring Sweetwater Forest campground or to the water quality of Griffith's Pond. It is to be assumed that, as an assisted living/memory care facility for the elderly, many if not most of the residents will be under medical care. Because of the size of the facility, APCC is particularly concerned about the potential for larger than normal concentrations of pharmaceuticals and other medical-related contaminants impacting groundwater in this area.

Recent studies on Cape Cod by the Silent Spring Institute have confirmed the presence of pharmaceuticals and other substances in private wells. Many of these contaminants have been linked to disruption of human hormone systems and certain types of cancers. Similar impacts have been noted in fish, amphibians, shellfish and other organisms living in ponds and rivers. In addition, there is a concern that low levels of antibiotics present in drinking water supplies may lead to resistant strains of disease-causing bacteria. Potential contamination of water supplies from pharmaceuticals is a subject that is receiving increasing attention nation-wide, and is an issue of growing concern on the Cape. Because of the Cape's porous soils, the reliance on groundwater for drinking water, and lack of wastewater infrastructure throughout the region, the Cape appears especially vulnerable to this emerging group of contaminants.

The nature of the proposed MP Renaissance project and the intensity of use on the project site could create serious threats to water quality that are not usually considered in normal residential or commercial development. Advanced wastewater treatment systems are used on Cape Cod for the purpose of removing nitrogen and pathogens. However, only certain types of aerobic treatment systems are capable of partially removing some— but not all— pharmaceuticals and contaminants.

The Cape Cod Commission should require the applicant to use a treatment system that provides maximum treatment of medical contaminants in wastewater. In addition, a monitoring program should be required that includes the installation of test wells that screen for likely pharmaceuticals and other contaminants. Monitoring of these test wells should be conducted on a regular basis and should be required for a minimum of three years. A contingency plan should be adopted that will quickly address the presence of contaminants that may be identified from the monitoring. This is a critically important issue that must be resolved in the DRI review process. The issue of pharmaceuticals and other emerging contaminants is not isolated to the MP Renaissance project; for future as well as for existing development, greater attention will need to be paid to addressing the environmental and human health impacts of pharmaceuticals in our groundwater.

To help meet the required 5 ppm nitrogen loading limits and to minimize impacts to water resources, APCC recommends that the applicant commit to reducing or eliminating the use of fertilizer on the property. APCC also recommends that the applicant eliminate pesticides in its turf management program to the greatest extent possible.

**Open Space:** The applicant is proposing to permanently preserve 8.01 acres of open space on-site to meet the Regional Policy Plan's open space requirements. The 8.01-acre set aside is the minimum that would satisfy the 1:1 open space requirement if the Cape Cod Commission chooses to remove a Significant Natural Resource Area designation for the site, based on the Brewster Water Commission's letter indicating the town does not plan to use this area for public

water supply development.

In the previous DRI filing of this project, the proposed on-site open space set aside was 8.83 acres for a development envelope of 8.78 acres. In the new proposal, the applicant has reduced the development envelope to 8.01 acres, thereby increasing the amount of undeveloped land on the property. Even though the amount of undeveloped land has been increased, the proposed protected open space has actually been reduced by .77 of an acre. APCC strongly encourages the applicant to honor the original 8.78-acre open space proposal.

APCC thanks the Cape Cod Commission for this opportunity to provide comments.

Sincerely,



Ed DeWitt  
Executive Director



Don Keeran  
Assistant Director