

March 28, 2022

Town of Swampscott Conservation Commission
c/o Ms. Marzie Galazka, Director of Community Development
22 Monument Avenue
Swampscott, MA 01907

Re: Review of Notice of Intent, MADEP File #071-0349
New Swampscott Elementary School
10 Whitman Street, Swampscott, MA

Ladies and Gentlemen:

This correspondence is submitted to you in accordance with our proposal dated November 26, 2021. Our review of the project and related materials and information is being conducted to assure compliance of the project, plans and submitted data with the requirements of the Massachusetts Wetlands Protection Act (MAWPA), the Wetlands Protection Act Regulations, 310 CMR 10.00 et. seq. (MAWPA REGS) and the Massachusetts Department of Environmental Protection 2008 Stormwater Regulations and Handbook (MADEP 2008 SWR & MADEP 2008 SWH).

At the Town's request, our firm visited the school property and the adjacent Ewing Woods property with our wetlands consultant on Wednesday, December 29, 2021. We visited the school property and the adjacent U.U. Church property on Thursday, March 10, 2022. We also attended the public hearing held by the Swampscott Conservation Commission (SCC) virtually on Thursday, March 24, 2022, and had a virtual meeting with the Applicant's Engineers to discuss the project on Monday, March 21, 2022.

PROJECT DESCRIPTION

The project consists of the demolition of the existing building and site improvements on the Stanley School property located at 10 Whitman Street in Swampscott and the construction of a new elementary school and site improvements on the property along with a proposed access to the adjacent property of the U.U. Church. While none of the work is proposed within wetland resource areas, portions of the work will occur within the wetlands buffer zone of wetland resource areas and the work has the potential of impacting wetland resource areas through sediment and changes in site drainage.

REVIEW MATERIALS

The following is a list of the materials received by our firm for our review:

1. Existing Conditions Survey Sheet Number EX-1 dated April 16, 2021, Topographic Plan of Land, Unitarian Universalist Church of Greater Lynn, PROGRESS DRAWING dated 12/23/2021 and a Wetland Resource Area Analysis Report, Stanley Elementary School, 10

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Whitman Street, Swampscott, MA dated April 2, 2021 by LEC Environmental Consultants, Inc., 100 Grove Street, Suite 302, Worcester, MA 01605.

2. Wetland Resource Area Analysis Report, Stanley Elementary School, 10 Whitman Road, UU Church of Greater Lynn, 101 Forest Avenue, Swampscott, MA, dated January 17, 2021, by LEC Environmental Consultants, Inc., 100 Grove Street, Suite 302, Worcester, MA 01605
3. Preliminary Geotechnical Engineering Report, Schematic Design Phase Services, Hadley Elementary School (Stanley School Site, Swampscott, MA, dated 5/3/21 by Nobis Group, Test Pits DRAFT Package, dated December 2021 by Nobis Group, Swampscott DD Estimate Drawings Volume 1, dated 1/22/22, Site Plan Drawings – DRAFT - Light Relocation, UU Church, dated 2/02/22, Existing Conditions Survey Sheet Number EX-1 dated April 16, 2021 and revised 4/22/21 and Topographic Plan Of Land, Unitarian Universalist Church of Greater Lynn, Sheet T-1, dated 1/05/2022.
4. Notice of Intent Filing including the Notice of Intent and Attachments, dated February 23, 2022, Stormwater Report, dated February 23, 2022, and Plans dated 2/25/22.
5. Supplemental Information provided by the Applicant's Engineer on March 23, 2022.
6. Letter from Town Counsel to the SCC regarding property ownership dated March 24, 2022.

Our review of the project outlined in this report is based on the above submitted materials listed above.

PROJECT REVIEW

The following are our firm's observations, comments and concerns regarding the proposed project and the information reviewed. The numbered items in this report are the items that we feel require a response or action by the Applicant and/or his Engineers. We have attempted to avoid repetition of the issues in the review, however, many of the issues are inter-related and how the Applicant addresses one issue may affect other issues and may raise new issues. We have also attempted to create a comprehensive list of concerns; however, it is possible that we may have unintentionally overlooked an item or included an item more than once.

NOTICE OF INTENT FILING:

The MADEP has issued a file number, MADEP FILE #071-0349, in response to the Notice of Intent (NOI) filing for the project and as of Friday, March 25, 2022, had no technical comments. With the issuance of a file number by MADEP, the public hearing for the project may be closed when the SCC determines that they have received all the necessary information on which to base their decision and an Order of Conditions (affirmative or denial) may be issued, if the SCC so votes.

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NOTICE OF INTENT

The following are our comments on the Notice of Intent (NOI) as filed. A corrected/revised NOI Form and supporting materials should be filed with the SCC and MADEP in response to these comments.

1. The Notice of Intent Form as filed with the SCC at the beginning of the month was improperly completed. The box under Section A2 of the form indicating there were multiple property owners was not checked and it should have been. In addition, ownership information for the adjacent UU Church property was not shown in the form was not signed by the UU Church as an owner. We understand that after the filing of the NOI, the Town of Swampscott made an eminent domain taking against the UU Church property. We have been provided a copy of a letter from Town Counsel to the SCC asserting that the eminent domain taking qualifies the town of Swampscott as a "Owner" under the wetlands protection act. While the issue of land ownership and rights to file the NOI are legal issues and need to be resolved by an attorney or the courts, we believe that the NOI Form should be revised to indicate multiple property owners, indicate the eminent domain taking, add the book and page of the eminent domain taking to the recording information on the form and an explanation as to the town's ability to file the NOI should be attached to the form. This amended form should be filed with both the SCC and the MADEP as part of the official record for this filing.

Abutter notifications appear to have been sent by the Applicant's Representative based on a List of Abutters certified by the Town of Swampscott Assessors. It appears that these Notifications were sent by Certified Mail *based on the copies of the white slips attached to the NOI). From reviewing the white slips, It does not appear that return receipts were requested and the green cards have not been provided to the SCC. 310 CMR 10.05(4)(a) states in part, "...The applicant shall provide written notification to all Abutters required to be notified by hand delivery or certified mail, return receipt requested, or by certificates of mailing..." When Certified Mail is the chosen method of notifying the abutters then the Regulations require that a Return Receipt be requested. Having said that, the regulations do allow for the use of a Certificate of Mailing for notices to abutters. The filing did provide the stamped white certified mail slips along with a listing of the mailing stamped by the US Post Office. It is our opinion that the notice to abutters meets the requirements of the regulations in that the applicant did provide evidence that the notices were mailed to the abutters.

NOI WETLAND FEE TRANSMITTAL FORM

NO NOI Wetland Fee Transmittal Form was completed and filed, however, since this is a municipal project which is fee exempt under the MAWPA REGS this is fine.

NATURAL HERITAGE & ENDANGERED SPECIES PROGRAM (NHESP)

The NOI correctly identifies that the project does not contain and is not located adjacent to or in proximity to any areas identified as Estimated Habitat of Rare Wildlife as indicated on the most recent Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the NHESP.

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WETLAND RESOURCE AREA DELINEATION

As previously stated, at the Town's request, our firm visited the school property and the adjacent Ewing Woods property with our wetlands consultant on Wednesday, December 29, 2021. We again visited the school property and the adjacent U.U. Church property on Thursday, March 10, 2022. The following is a summary of the details of our wetlands consultant's (Seekamp Environmental Consulting, Inc. (SEC)) findings regarding the wetland delineation and resource area characterizations performed by LEC for the Stanley Elementary School project in Swampscott, MA.

While at the site we reviewed the wetland flagging set by LEC on the Ewing Woods parcel (Flags 1-32) and the UU Church parcel (Flags A1 - A53) along with LEC's wetland report(s). The following are our findings:

Ewing Woods wetland - SEC substantially agrees with the placement of the wetland boundary flagging on this offsite parcel. While describing this area as "hydrologically isolated and topographically confined", LEC has chosen to characterize this area as a Bordering Vegetated Wetland (BVW) due to the presence of an "internal intermittent stream channel". LEC's contention is the existence of such a feature within the isolated wetland qualifies this isolated area as a BVW under the Massachusetts Wetlands Protection Act (Act, M.G.L. c. 131, s.40) and it's implementing Regulations (Act Regulations, 310 CMR 10.00 et. al.). While we believe this area likely constitutes Isolated Land Subject to Flooding and an Isolated Vegetated wetland we take no exception to LEC calling the area "Bordering Vegetated Wetlands" with an associated "Buffer Zone".

UU Church Parcel wetlands - SEC substantially agrees with the placement of the wetland flags for the relatively large wetland defined by flags A1 - A53. In like fashion to the Ewing Woods wetland, LEC has described this area as "hydrologically isolated and topographically confined" and has characterized this area as a Bordering Vegetated Wetland (BVW) due to the presence of an "internal intermittent stream channel". LEC's contention is the existence of such a feature within the isolated wetland qualifies this isolated area as a BVW under the Massachusetts Wetlands Protection Act (Act, M.G.L. c. 131, s.40) and it's implementing Regulations (Act Regulations, 310 CMR 10.00 et. al.). While we also believe this area likely constitutes Isolated Land Subject to Flooding and an Isolated Vegetated wetland we take no exception to LEC calling the area "Bordering Vegetated Wetlands" with an associated "Buffer Zone"

Other wetland area(s) - Upon review, SEC has found what we believe to be a separate small wetland area on the UU Church Site which has not been identified. This is a small remnant pocket wetland, located at the very bottom of the long, narrow island on the UU Church parking lot, which is immediately adjacent to several wet sumps connected by concrete pipes which had saturated soils and a small amount of standing water in them at the time of our review. The pocket wetland appears to have a predominance of wetland species in the tree, sapling and shrub canopies, with the herbaceous stratum inconclusive due to the winter seasonal conditions. Soil conditions were saturated but inconclusive due to refusal at 10 inches or so below the ground

surface due to the dense rock substrate here.

In keeping with LEC's definition of such pocket wetlands connected by pipes (intermittent stream) while being "hydrologically isolated and topographically confined, our understanding is that these meet that definition the same as other wetlands identified as BVW on the Ewing Woods and UU parcel. It is our understanding that currently, future work is proposed in this area which involves a walking path through this wetland. Further, our understanding is these areas were constructed prior to 2008, and while they may have been done under a valid Order of Conditions, they have no Operation and Maintenance Plan associated with them. As such, it is our opinion these wet areas should delineated and shown on the Plans with their Buffer Zone and any work in these areas should be avoided if possible.

2. We understand that LEC feels that these areas are not jurisdictional and that they have reached out to MADEP. They have reported that MADEP agrees that these areas are not jurisdictional. In our opinion the Applicant should provide a written letter or email to the SCC from MADEP stating that they have reviewed these areas and in their opinion they are not jurisdictional under the MAWPA. Otherwise, these areas should be delineated, shown on the plans and the proposed path should be moved out of these areas.

Vernal Pools - While SEC reviewed both the Ewing Woods wetlands and the UU Church wetlands out of the optimum period to observe vernal pool activity or evidence (each area was completely ice covered), we agree with the preliminary assessment LEC has made in calling out these areas as having vernal pool characteristics. In our opinion, they are likely vernal pools, and we are now fast approaching the optimum season for vernal pool assessment and conformation of amphibian breeding activity if the SCC feels this is necessary.

Because all the wetlands identified adjacent to the project are isolated, their hydrological regimes should be carefully considered and stormwater runoff should be balanced in the post project construction (see comments in this report under the Stormwater section).

STORMWATER REPORT, CHECKLIST, CALCULATIONS, CPPPP, LTO&MP

The Stormwater Management Standards apply to this project and a Stormwater Report with a Checklist for Stormwater Report, Calculations, CPPPP and LTPPP was prepared and filed with the NOI. Our comments on the Stormwater Report are as follows.

3. The Table of Contents for the Stormwater Report is missing all the items before Stormwater Standard 7, It appears there is a page missing.

The study was performed using HydroCAD Stormwater Modelling Software which is based on NRCS TR20 which is the methodology approved by MADEP. Rainfall data used is based on NOAA Atlas 14 which is the latest data available and Runoff Curve Numbers are based on the NRCS RCN Tables.

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4. The Soils data attached to the Stormwater Report is all labeled, "draft". This data should be finalized and the Stormwater Report should be updated with the final data. Were any of the test pits observed and logged by a Massachusetts Licensed Soil Evaluator?
5. The soil type used for many of the existing and proposed watersheds is predominantly HSG D with some HSG C and a small portion of HSG B in the existing watersheds. Many of the soils on the site are mapped as Udothents or Urban Land. The adjacent soils are HSG B soils. The Engineer needs to explain his use of HSG D soils for the modelling rather than HSG B or even HSG C soils.
6. Many of the times of concentration for the modelling were directly entered as 6 minutes, which is the minimum for the methodology. The times for each subcatchment should be entered as the longest flow path and a minimum time of 6 minutes should be entered under Advanced Options. The software will then calculate the time of concentration from the flow path and either use that time or 6 minutes, whichever is longer.
7. The calculations in the model do not include the outlet pipes from the underground detention basins and they need to. This is a concern as it appears that the existing 18" pipe that the runoff flows to does not have sufficient capacity to carry the flow in larger storms (an older 18" concrete pipe at a slope of 0.857% has a capacity of about 8.6 c.f.s. while the 25 year storm flow out of the two detention systems and bypassed drainage is 10.44 c.f.s. and the 100 year storm flow is 22.34 c.f.s.). Therefore, the model's assumption of a free discharge out of the control structures may be incorrect and the underground storage systems may not function as expected in larger storms. The model should be updated to include these discharge pipes in the calculations. Also, the actual elevations of the 18" pipe at the connection point were not obtained as the manholes were not found. Has there been a correlation between the elevations on the old plan of the 18" pipe and the datum of the present survey? Using that correlation, what is the elevation of the 18" pipe at the connection point?
8. Why is the drainage from the southeast corner of the site not connected to the isolator row and subsurface detention system #2? It seems that a lot of drainage pipe is being installed when this flow could be connected to the storage system. This would decrease the load on the proposed jellyfish treatment system.
9. There are a number of manhole locations where the angle between the upstream drain pipes and the discharge pipe is less than 90 degrees. It appears that most of these can be eliminated by adjusting the manhole locations. We recommend that these be changed where possible so that the pipes are at least 90 degrees apart (not less than 90 degrees).
10. The proposed underground storage facilities are located below the likely Estimated Seasonal High Groundwater Table (ESHGWT) and not 2 feet above the ESHGWT as MADEP requires for all such facilities. While we understand the difficulties this site presents this is contrary to MADEP requirements. The facilities have been encapsulated in an impermeable barrier which is good engineering practice. If these systems are to remain as designed, the Engineer should include a plan to monitor the systems for groundwater intrusion, a corrective action plan should

this occur and flotation calculations for the dry systems. Also, details should be included for sealing the system barrier at all penetrations (such as at pipes). We suggest that the LTPPP inspection interval for these systems be increased to every 2 months from twice/year.

11. What precautions are being taken in the blasting specifications for the project to ensure that none of the blasting work will create any unforeseen changes in the adjacent wetlands (such as opening up cracks in the underlying rock which could cause the wetland to dry up)?
12. The project is proposing the use of proprietary BMPs to treat the stormwater from the project (isolator rows and jellyfisg filter). Given that this is a publicly bid project we understand that in general alternates may be proposed by the Contractor. The OOC to be issued for the project will state that any alternates that the part from the proposed storm water treatment system must be submitted to and approved by the SCC prior to the contractor ordering this alternative system.
13. All references in the Stormwater Report to the 2017 CGP should be updated to reference the 2022 CGP and the 2017 CGP in the DRAFT SWPPP needs to be replaced with the 2022 CGP.
14. The SWPPP provided is a DRAFT SWPPP which is appropriate at this point. The OOC for the project should require that a final SWPPP be prepared, submitted to the SCC for review and be approved by the SCC prior to any site work occurring on the project.
15. We are attaching to this report questions that the acting chair of the SCC forwarded to us has regarding the LTPPP, CPPPP and other aspects of the project. Rather than repeating these questions herein, the Applicant and his Engineers should also address the questions that are attached hereto.

DESIGN AND PLAN REVIEW AND COMMENTS:

GENERAL

16. The plans filed with the NOI all say, "DD SUBMISSION and DRAFT PERMIT – NOT FOR CONSTRUCTION". While they are signed and sealed by a Massachusetts Registered Professional Engineer, the Applicant needs to understand that once these plans are accepted and the project is approved by the SCC, ANY changes to the plans will have to come back to the SCC for a determination as to whether the changes are significant, require an Amended OOC or the filing of a New NOI. The labels "DD SUBMISSION" and "DRAFT PERMIT – NOT FOR CONSTRUCTION" should be removed from the final revised plans before acceptance by the SCC.
17. The plans do not show any underdrains around the building or in any other locations. Will there be any underdrains installed for the project? If so, they should be shown on the plans.

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18. The LIMIT OF WORK and EROSION CONTROL lines should be shown on the Site Layout, Utility, Drainage and Grading Plans.
19. We understand that the Town has made an eminent domain taking of an easement or other property rights in the adjacent UU Church property. The location of this easement should be added to all of the plans for the project.
20. Landscaping plans showing the treatment of all non-paved areas should be submitted to the SCC. These plans should be reviewed by the SCC to ensure that there are no non-native species and invasive species proposed for the project.

Sheets C-100 & 101

21. Include a note defining what the terms "R&D" and "R&S" mean.
22. There is some R&D Pavement outside of the erosion control line as well as water line work.. The erosion control line should be adjusted to include these areas.
23. An access gate should be added to the west side of the work to gain access from the Church Property.
24. It appears that the location of the construction fence on the south side of the property needs to be adjusted in a southerly direction to accommodate all of the work.
25. A limit of work line needs to be shown on this plan (and all of the plans).
26. Is there no R&D or R&S work proposed on the UU Church property (none is shown)?

Sheets C-200 & 201

27. Dimensions should be shown on all driveways walks, etc.
28. the plan shows the work extending north away from the main school site however the details of this work are not shown.
29. The crosswalk at the outlet to Whitman Road should be perpendicular across the roadway.
30. Which ADA parking spaces are van spaces? What pavement type is in front of the school building between the ADA access?
31. How tall is the chain-link fence around the basketball court?
32. Which parking spaces are EV spaces? Are there signs designating the EV spaces? Are there any compact parking spaces?

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- 33. What is the large stippled circular area between the parking lot in the roadway?
- 34. What are the paved surface types at the front of the new building?
- 35. What is the construction of the pathway in the UU church property?
- 36. There are no details of the crosswalk ramps, etc. at Laurel Road and Forest Avenue.
- 37. The paint striping appears to end at the western end of Forest Avenue, why?
- 38. The southerly end of the driveway and walkway(near the 20.00 dimension) does not meet existing conditions, why?
- 39. The vehicle gates in the driveway's appear to be single leaf 28 foot wide gates. These are very heavy and we suggest you consider changing them to double leaf 14 foot gates.

Sheets C-300 & 301

- 40. The new water connection to the 10 inch main south of the school is located off the school property and outside of the erosion control and limit of work lines. Will a street opening permit of Forest Avenue be required for this work? As previously stated limit of work and erosion control lines need to be adjusted to include this work.
- 41. The hydrant connections are shown on this plan as 4". Standard practice is for these connections to be 6" and the detail on the plans shows these connections as 6". The discrepancy should be reconciled
- 42. We suggest consideration being given to adding a divisional valve on the long section of new 8 inch water line.
- 43. The inverts for the proposed 5000 gallon grease trap should be shown and slopes should be shown on all proposed sewer lines. The sewers entering SMHs 302 and 304 should be adjusted to be 90° or greater.
- 44. There should be a gate valve on the water line connecting to the fire hydrant near subsurface detention system #1
- 45. The curbing is located directly over the frame and cover of EX. SMH#308. The curbing configuration should be adjusted.
- 46. A note should be added to the lights along the new walkway on the UU Church property to indicate that these are lights.

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Sheets C-400 & 401

47. The manhole covers on the jellyfish treatment unit should be shown on the plan as the curbing is located across the unit. If necessary either the location of the unit or the curbing configuration should be adjusted.
48. How deep is the foundation of the new school building adjacent to the subsurface isolator row proposed for roof drain #4?
49. All of the drain pipes on the drainage plans need to have pipe slopes shown on them.
50. What is the circle located in the northwest corner of subsurface detention system #1? The plan should also show the locations of the access/cleanout manholes for both of the subsurface detention systems.
51. A note should be added to the plans denoting that, "CPP" is corrugated plastic pipe.
52. What is the invert elevation out of DMH #207?

Sheets C-500 & 501

53. Spot elevations should be added to the plan where the contours are spaced further apart. The rim elevations of catch basins should be shown on the plan.
54. The Engineer should review the slope of the parking lot northwest corner (appears to be steep),
55. The sidewalk along the west side of the parking area does not show a railing as required by ADA. Details need to be added to the detail sheets in the parking lot may require a retaining wall along the west side due to walkway slope and level landings. The Engineer should review this.
56. The plan should show the surface features around the school that are shown on the previous plans. These features should be identified and the planters and other structures at the front of the school should also be identified.
57. The limit of work and erosion control should be expanded at the southeast and corner of the site where the driveway connects to the existing pavement in Forest Avenue. Grades should also be shown at the pathway to the woods at the south side of the new school building.
58. The grassed area between the new driveway on the east side of the site and the property line appears to grade into the neighbors' yards (it does not presently do this). What is the impact of this work on the neighboring properties?
59. What is the limit of the full depth pavement reconstruction on the UU Church property?

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Sheet C-600

60. The tracking pad is shown as *12 x 50. We believe that this should be wider (even for one way traffic) and it should be clarified as to whether the optional wash rack is included/required or not. The detail should correlate with plans.

Sheets C-601 & 602

No Comments.

Sheet C-603

61. The typical trench drain detail references to XX.XXX should be changed to actual numbers.

62. In the SC 740 chamber detail, what material is to be used under, over and immediately inside the impermeable liner material for the subsurface storage systems? Is there a stone size limit or material spec for the fill material over these systems? We assume that the 18" cover is under paved areas only and that deeper cover is required under non-paved areas but this should be clarified.

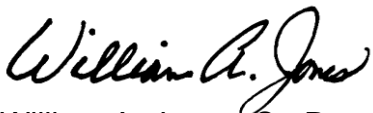
63. In the Isolator Row Detail, what is the sump depth?

64. We suggest that an additional manhole cover be included in the OCS Detail so that access can be gained to each side of the weir plate for cleanout.

We look forward to discussing the project, this report and any questions that the SCC may have regarding the project at the continued public hearing. We are available to discuss the project with you, your staff and/or the Applicant and/or his Engineers and representatives as necessary.

Very truly yours,

LINDEN ENGINEERING PARTNERS, LLC



William A. Jones, Sr. Partner



Richard G. Cutts, P.E., President

William Jones

From: Tonia Bandrowicz <tbandrowicz@gmail.com>
Sent: Monday, March 21, 2022 10:50 AM
To: William Jones
Cc: Marzie Galazka; Marissa Meaney; Colleen Hitchcock; Monica Tamborini; Randall Hughes; Jonathan Grabowski; MONICA LAGERQUIST; Max Kasper; David Harris; Dan Fleming; David Conway; Nicholas O. Botts; Carroll, Mike; Vo, Andy; Leigh Sherwood; Steve Laput; Suzanne Wright; Toni Bandrowicz
Subject: Re: Wetlands Delineation Review, Stanley Elementary School Project, Swampscott, MA.
Attachments: ConCom - Sample_Special_Conditions_-MACC (2).pdf

Thank you, Bill, for this preliminary information. The Commission looks forward to receiving Linden's final report. I've taken a look at the NOI attachments and below are a few comments and questions for consideration in your peer review and/or for the town's consultant at the next public meeting. Also I know that Melissa sent you the potential special conditions that the ConCom considers when issuing OOCs. I've also attached here, fyi, a more exhaustive list of potential conditions that MACC has made available to the ConComs. Thank you for your assistance, Toni

Long Term Pollution Prevention Plan and Stormwater Operation & Maintenance Plan

-O&M plan includes routine maintenance, insp. and repair of stormwater system, street sweeping, etc., and specifically references ConCom. If an OOC is issued, elements of both plans should be included as ongoing conditions that continue in perpetuity.

-who will be responsible for the ongoing maintenance? DPW? School Dept? If it's the school, does it have staff to perform or does it need to contract out? If the latter, does this need to be included in the school budget?

-and how to ensure the maintenance is done? Who will be filling out the insp. forms that are supposed to be submitted? Is the submission of such insp. rpts. sufficient?

Stormwater Rpt. dated 2-23-22

-my very general understanding is that, although there will be an increase in impervious surface, the proposed water quality treatment will both reduce peak runoff from the site and remove solids and phosphorus from the discharge. I assume the reduction in flow is due mainly to the retention basins. I understand how proposed water quality systems will also reduce solids (via settling), but how do they also result in a reduction of phosphorus?

-the report references the O&M plan requirements (mentioned above) but also the need for proper snow management. Is there a snow disposal plan? And is it in accordance with Mass. Policy? Some specific questions: where will the snow be stored? And what snow/ice treatments are proposed?

-if an OOC is issued, the proposed treatment (deep sump and hooded catch basins, subsurface detention systems with isolator row, etc.) should likely be included as conditions in perpetuity, which again raises issues of responsibility for maintenance of those systems.

-as raised at the Mar 17 meeting, the Commission would like to have further discussion on possible protective barriers between the school and Ewing Woods.

Draft SWPPP (for construction period)

-I noticed that draft says it's in compliance with 2017 Construction Gen. Permit; note that there is now a newly effective 2022 CGP that town will have to file under.

-what federally listed threatened or endangered species or their habitat is in the site area? I was under the assumption there were none in Swamp't.

-the SWPPP talks about pesticides, herbicides, fertilizers, etc. and the need for them to be safely contained. The Commission believes there needs to be discussion on restricting use of such materials.

-I note that "personnel responsible for inspections" is not named (section 6.1). Also not named is personnel responsible for corrective action or delegations of authority (section 6.2 and 6.3).

-copies of SWPPP insp. rpts. should also go to ConCom.

Misc. Q.

-is the Forest River paper road part of the Ewing Woods easement? Is there a deed showing boundaries?

-I understand that the select board voted to take by eminent domain the UU Church easement, has this been recorded? Is this sufficient to give town "ownership" for purposes of submitting the NOI with church signature? Is there a confirmation from town counsel on this?

-given ledge, I assume that there will have to be blasting, which would involve production of large amounts of dust and debris that could have the potential for being problematic for resource areas. What measures are proposed to be taken to address this?

-as has been noted, the Commission will have to review the issue of whether there is a small remnant pocket wetland, located at the very bottom of the long, narrow island on the UU Church parking lot.

-what steps, if any, are proposed to be taken to protect vernal pools in UU Church property this spring?

-while may not have authority to require addressing invasive species, at minimum, the Commission should consider making recommendations.

On Thu, Mar 17, 2022 at 3:57 PM William Jones <bjones@lindeneng.com> wrote:

This purpose of this memo is to provide you with the details of our wetlands consultant's (Seekamp Environmental Consulting, Inc. (SEC)) initial findings regarding the wetland delineation and resource area characterizations performed by LEC for the Stanley Elementary School project in Swampscott, MA. Both Linden Engineering and SEC visited the Site on two occasions, in December and last week, and have reviewed the wetland flagging set by LEC on the Ewing Woods parcel (Flags 1-32) and the UU Church parcel (Flags A1 - A53) along with LEC's wetland report.