

TOWN OF PALMER CONSERVATION COMMISSION

Meeting Minutes

Tuesday, February 5, 2019 – 6:30 PM

LOCATION: Town Administrative Building Meeting Room

Donald Blais, Chair
David Cotter, Vice Chair
Peter Izyk
Nicholas Zeo
Brenda Cole
Dorothy Lawrence
Lucas McDiarmid

Angela Panaccione, Agent
Jeff Stanhope, Assistant

Members Present: Donald Blais, Jr.
David Cotter
Peter Izyk
Nicholas Zeo
Brenda Cole
Dorothy Lawrence
Angela Panaccione, Conservation Agent
Jeff Stanhope, Conservation Assistant

Members Absent: Lucas McDiarmid

Also Present: Jerry E. Mange Jr., 58 Quaboag Valley Co-Op
Richard Wiesner, 70 Quaboag Valley Co-Op
Nancy Bisnette, 28 Quaboag Valley Co-Op
Barbara Martowski, 965 Ware Street
Donald Frydryk, Sherman & Frydryk / 3 Converse Street
Rosemary Rugg, 1117 Ware Street
David Haines, Haines Hydrological / 141 Old Enfield Road, Belchertown
Joe Paolini, Forest Lake Properties / Framingham
Rick Licht, Licht Environmental Design / Gray, Maine
Steve O'Connell, Andrews Survey & Engineering
Paul McManus, EcoTec, Inc.
Mike Marciniak, Planning Board
Christina Pike, 631 River Street, Thorndike
John Thomas, SWCA / Amherst
Colleen Puzas, SWCA / Amherst

1. **Call to Order:** 6:30 PM – Donald Blais, Jr. (Chair)

2. **Chair, Member & Committee Reports:** No Chair, Member & Committee Reports.

3. **Review Phone/Mail/E-Mail Messages**
 - a. **FCP Review – Ware Street**

No Comment. Will File.

b. FCP Review – 36 Juniper Street

The Plan Preparer/Consulting Forester for the 36 Juniper Drive Forest Cutting Plan (FCP) is John Edwards. The Conservation Commission would like to be provided documentation of the exposure to invasive species (insects/pests), like Gypsy moth and especially for the presence of Hemlock woolly adelgid (HWA) on hemlock too. Additionally, the Commission would like to be provided evidence of how they plan to retain at least > 50 % residual Basal Area (BA) in the wetlands when they plan to remove most canopy trees as well as cut 90 % Basal Area per Acre (BA/AC) and leave 10 % BA/AC. Jeff Stanhope will send the Commission's FCP comments via e-mail to the state Service Forester for Palmer, Doug Hutcheson, before the end of the week because we have a deadline of five days to do so.

4. Public Inquiries

a. Quaboag Valley Co-Op: Bank Erosion Concerns

Jerry Mange, Grounds and Maintenance Director for Quaboag Valley Co-Op (QVCO), was present at tonight's meeting. He reminded the Conservation Commission that the Quaboag River wraps around the mobile home park. Jerry Mange mentioned on Palmer Road, closer to Ford Street, is the location of homes number #2 and #3. Home #2 is on the edge of the bank and home #3 is slightly further back from the bank. He went on to explain the river has been eroding the bank for years because it flows straight into the corner of the aforementioned bank and undermines it. The bank undermining is caused by multiple swirls in the river that spin all day long. The undermining of the bank has led to other complications as well like a tree toppling over and now many more trees are at risk of toppling too. They had another big tree that was about ready to fall onto another home, but the Agent gave them permission to take that tree down piece by piece as well as to take it away, so that's what they've done.

While referring to a map of QVCO he had in front of him, Jerry Mange described behind home #1E, which is right at the beginning of Ford Street, the U.S. Army Corps of Engineers (USACE) had done some prior work there. The area behind homes #1B, #1A, #1, #2 and #3 and the homes themselves are what QVCO are concerned with because these homes are all close to the bank and the bank is falling over. Jerry Mange shared pictures that displayed how the trees on the approximately 50 foot high bank are leaning out towards and over the homes. He mentioned they have fence all the way around the park located all along the river that is set back an unknown amount of feet from the river as well. His concern in regard to the fence is that there are hazard and problem trees on the opposite side of the fence. They've been working the last few years cleaning up their trees, but there are a lot of trees on the fence line that are on the opposite river side that are leaning over their homes causing concern. They've trimmed a few, but they don't know if they can legally trim them because they are on the other side of the fence. The Agent explained to him that they are allowed to trim the trees without permission, but need permission to remove trees. Jerry Mange asked if they [QVCO] would have to pay for tree work on the other side of the fence because it would be a financial burden for them. From his understanding, they were told they were not supposed to perform any work on the other side of the fence. Dorothy Lawrence described how the property line ends and then after that it appears to immediately be the river. Jerry Mange doesn't know if the river bank is their property line or if it's the fence. There is a possibility the fence is the property line/boundary, therefore they [QVCO] cannot work outside of their land. The Agent thinks the true purpose of the original installation of the fence was potentially done by themselves for safety of the residents of the trailer park. Peter Izyk said it would be a good idea to access and see the property deed for the true boundaries of the property of QVCO and possibly see if the fence in question is on the boundary line according to the written description to be seen within the deed.

The Agent said there were in depth discussion at the Community Resilience Building Workshop for Municipal Vulnerability Preparedness about the high priority and imminent necessity for an action plan for Quaboag Valley Co-Op. An example given by the Agent were trailer parks in Greenfield, MA & Brattleboro, VT that were washed out because of floods. She discussed the history of discussions about the potential for re-location of QVCO to a new location that is outside of a flood zone. Half of QVCO is currently located in a flood zone, therefore it's at an extremely high risk for damage from flood waters. The Agent reached out to the U.S. Army Corps of Engineers to see if they have any interest in getting involved in something like this and she made the Federal Emergency Management Agency (FEMA) aware of it as well. The Agent said hopefully within the next two years FEMA may step in and help come up with a solution for the problems of the trailer park. Jerry Mange inquired about working with the Agent and Conservation Commission to obtain approval to cut down more hazard trees before it is too late and they cause property damage because they are a public safety concern as well. Peter Izyk explained QVCO has been dealing with these issues for a very long time because in the past they have come to the Commission for advice and short-term solutions were acted upon, but the bank needs to be saved before it causes permanent damage to QVCO. Climate change makes QVCO an even higher priority and a greater risk necessary to be addressed and taken action on immediately. The Agent will send additional letters to Army Corps of Engineers on behalf of the Commission and QVCO in an attempt to catch their attention. She will also write a letter to the Town Manager, Charlie Blanchard, to see if he can have any influence on getting the word out about the concerns QVCO is facing. David Cotter requested more photographs of the bank possibly taken from a boat, especially to send to the Army Corps of Engineers and others as well to show the reality of how bad the loss of bank actually is. Brenda Cole asked if the USACE comes out annually and if so when. The Agent said they've spoken with Gerry Skowronek, DPW Director, in the past and had discussions about QVCO's bank problem.

5. Approval of Minutes

a. January 22, 2019

Motion made by David Cotter to approve the minutes from January 22, 2019 as amended.

Motion seconded by Peter Izyk.

Dorothy Lawrence abstains.

No further discussion – 5-0-1 – Motion Carries.

6. Approval of Payables:

a. Mileage – \$226.78

Motion made by Dorothy Lawrence to approve the payable to Angela Panaccione for Mileage Reimbursement from 1/13/2019 – present from the Conservation Commission Town Wetlands Ordinance Account.

Seconded by Brenda Cole.

No further discussion – 6-0-0 – Motion Carries.

b. MVP – \$36.10

Motion made by Nicholas Zeo to approve the payable to Angela Panaccione for Beverages and Ice Reimbursement for the Municipal Vulnerability Preparedness Community Resilience Building Workshop from the MVP Grant Account.

Seconded by Brenda Cole.

No further discussion – 6-0-0 – Motion Carries.

c. MVP – \$1,009.00

Motion made by Dorothy Lawrence to approve the payable to Burgundy Brook for Breakfast and Hot Lunch Catering for the Municipal Vulnerability Preparedness Community Resilience Building Workshop from the MVP Grant Account.

Seconded by David Cotter.

No further discussion – 6-0-0 – Motion Carries.

d. MACC – \$750.00

Motion made by Dorothy Lawrence to approve the payable to MACC for the Annual Environmental Conference Registration from the General Expense Account.

Seconded by Brenda Cole.

No further discussion – 6-0-0 – Motion Carries.

7. Signing of Documents (DOA, OOC, COC, Ext, Etc.):

a. LAND Grant Agreement & Contract

Motion made by Brenda Cole to enter into a contract with the Commonwealth of Massachusetts Executive Office of Energy and Environmental Affairs Division of Conservation Services for the Local Acquisition for Natural Diversity Land Grant Program Project Agreement.

Seconded by Nicholas Zeo.

No further discussion – 6-0-0 – Motion Carries.

8. Schedule of Public Hearings

a. 7:00 PM Notice of Intent (NOI) DEP #256-0338: Altitude Organic – 1235 Thorndike Street (Map 73-58)

The applicant is requesting and Order of Conditions for the proposed development of a retail marijuana sales facility; including the demolition of existing building, new building construction and expansion of the parking area.

Donald Frydryk, of Sherman & Frydryk, was present at tonight’s meeting for the continuance of this public hearing. He provided the Conservation Commission with the construction, erosion, and sedimentation control plan requested by the Agent at the last meeting. Donald Frydryk said he followed through with the other request of the Agent by checking the building for drains and notified the Commission that no drains were found upon inspection of the building. The Agent doesn’t have any further questions or concerns and does not see any further issues. Peter Izyk said the applicant has complied with all of the requests of the Commission. Donald Blais closed the public hearing for DEP #356-0338.

Motion made by David Cotter to close the public hearing.

Seconded by Peter Izyk.

No further discussion – 6-0-0 – Motion Carries.

Motion made to by David Cotter issue the Order of Conditions with Finding of Facts.

Seconded by Peter Izyk.

No further discussion – 6-0-0 – Motion Carries.

b. 7:00 PM Notice of Intent (NOI) DEP #256-0339: Corydon C. & Rosemary Hovat Rugg – 1117 Ware Street (Map 37-39)

The applicant is requesting an Order of Conditions for the proposed development of a single family home. Work is proposed within a Bordering Vegetated Wetland and its buffer zone.

Donald Blais opened the public hearing for DEP #256-0339. David Haines, Environmental Consultant of Haines Hydrological Engineering, was present at tonight's meeting. The applicant is asking for a small wetland crossing in order to gain access to the rear/back of the property. A portion of the property as well as the garage will be in the buffer zone, but everything else is outside of the buffer zone. Wetland fill will be placed in a portion of the wetland to the north/upper area of the site. As part of the site plans, the applicant is proposing to do wetland replication too. The wetlands on site are degraded because some of the land had been logged in the past historically, which severely impacted the condition of the wetlands throughout the property. Silt fence and straw wattles will be utilized for erosion and sedimentation controls or the erosion control barrier. Some excavation will occur on the property as well. The Commission will be notified five days prior in order to go over the work and the erosion control barrier plan, as well as notified upon installation of the erosion and sediment controls so that the Commission can perform a site visit in order to check the quality and correctness of the controls.

Perched wetlands; glacial till; water; wetlands. Stream crossing; wetlands crossing. Anti-tracking pad. Disturbed soils plant and seed. Plantings will be planted; example, high-bush blueberry. Seeding will be seeded with Wetland Conservation Seed Mix; New England Wet Mix, or equivalent; mulch; check it for two growing seasons. Three 12-inch culverts to allow even flow across the crossing. Smaller culverts for smaller crossing; adequate for this particular/specific site. Wetland replacement/restoration area. Plant it with shrubs. Seed disturbed soils. Crossing will provide access to the house as well as access for any future logging operations on the land/property/site woods. The Agent would like to see in writing for alternative crossing styles and why they are/are not feasible. The Agent performed a site visit in September; David Haines did the delineations. The Agent is comfortable with the site plans, the delineations; likes the inclusion of the rain gardens; has concerns about the 12-inch smaller culverts because of their potential for backing up and being easily clogged up causing blockage. The Agent asked the Commission if they would like to perform a site visit here to walk the whole site. Picked the location of the crossing with the least amount of trees; mostly ferns and bark mulch; maybe an old landing site part of a historic logging operation; no trees or shrubs in the exact circle like area of site. Mark Stinson recommended alternative analysis; the Agent said how David Haines mentioned the site is all wetlands and no upland alternatives as well. Donald Blais will continue the public hearing for DEP #256-0339.

An abutter to the property, Barbara Martowski of 965 Ware Street, asked if the project will affect any of the wetlands or any of the abutters. She asked the Agent if she will check if it will or will not affect or cause any water issues/problems for abutters and wetlands. The Agent confirmed yes she will do that.

Motion made by Nicholas Zeo to continue the public hearing to Tuesday, March 5, 2019 at 7:00 pm.

Seconded by Peter Izyk.

No further discussion – 6-0-0 – Motion Carries.

c. 7:30 PM Notice of Intent (NOI) DEP #256-0336: Forest Lake Seasonal Cottages – Off River Street & Forest Lake Road (Map 36-86, 31-1-1, 30-11-5)

The applicant is requesting an Order of Conditions for proposed site development of a Seasonal Cottage Resort with lake front amenities; including the construction of canoe/kayak launch & beach restoration. Work is proposed within Forest Lake, within the Riverfront Area of the Ware River and associated buffer zones.

Rick Licht of Licht Environmental Design, Paul McManus of EcoTech, Steve O’Connell of Andrews Survey & Engineering, and Joe Paolini of Forest Lake Properties were present at tonight’s meeting. John Thomas and Colleen Puzas of SWCA, the environmental consultant firm retained by the Conservation Commission, were present at tonight’s meeting as well.

Licht Environmental Design, LLC provided the Commission with a letter dated January 7, 2019 as well as attached materials that respond to comments provided by the Palmer Conservation Commission and the Agent at the hearing of November 6, 2018. Enclosed were:

- Response to Comments letter – Licht Environmental Design, LLC
- New Plans entitled “Activities Subject To Jurisdiction of Conservation in Palmer, MA, prepared for Forest Lake Properties, LLC”, Plan sheets 1-6, prepared by Andrews Survey & Engineering, Inc., dated 01-07-19.
- Stormwater Management Report & Plans, Rev 2 dated 10-23-18.
- Avian Nest Survey letter report prepared by Eco-Tec, Inc. dated 12-05-18. (Copy previously emailed.)
- NHESP Letter dated 11-15-18.

The Licht letter of responses to Staff and Conservation Commission comments is as follows...

A. Wildlife and NHESP Review – The Mass Natural Heritage and Endangered Species Program has issued a response letter dated 11-15-18 (previously provided to your office, copy attached above) and indicating no adverse impacts or a prohibited take of any resource area habitats of any mapped state protected rare wildlife species. Additionally Eco-Tec, Inc. has completed an avian study to respond to comments regarding the potential presence of bald eagles, ospreys and great blue herons on the site and within immediate areas. That review found no evidence of nests of these species. A copy of their letter (previously emailed) is attached.

B. Additional Wetland Delineations – As requested by your office, Eco-Tec, Inc. has performed additional field work and delineation of bordering vegetated wetlands (wetlands) within the southeastern portion of the site and at the edges of the waterbody located more or less across from the site entrance (on the west side of River Street) which is connected to Forest Lake via a culvert under River Street. The additional wetland flags are numbered as follows together with the 50 and 100 foot buffer zones as shown on the attached Conservation Commission Exhibit plans. Flags were located by ground survey provided by Andrews Survey & Engineering. The plans indicate also which sections of delineation were affirmed by the Determination of Applicability (DoA) dated 10/17/18.

- Waterbody across River Street- Flags RS1 – RS4 have been added. The 50-foot wetland buffer does not encroach on the site. The 100-foot buffer overlays up to 20 feet of the site near the entrance.
- Southeast Section of Site – Flags below D14 and above C14 have been field verified.
- Ware River – The DoA affirms the flagging along the Ware River (Flags R1-R20). No additional field work is required.

- 200 foot Riverfront Area (RFA) along the eastern section north of Flag C14 northeast of WaterView Circle – The location of the riverbank within this wetland is north of and well into the wetlands. However as this was not affirmed by the RDA, the plans have used the *much more conservative edge of the BVW* as the basis for the 200-foot RFA as shown on the plans rather than the river itself to avoid any controversy over the basis for the RFA. (The RFA 200 foot jurisdiction line is shown from the actual river bank *AND* from the BVW delineation flags for comparison.) All grading and work has been eliminated from the more conservative 200-foot jurisdiction RFA at WaterView Circle. (It should also be noted that the existing Forest Lake Road lies between the project and the stream/wetlands within the 200 foot RFA.)
- Additional flagging South of Road E – Additional wetland resource delineation flags were placed by EcoTec in November 2018:
 - BVW Flags C76-C99 (Blue);
 - Bank/Mean Annual High Water of perennial stream (for RFA): D24-D27 (Red); and
 - Bank of Intermittent stream (non-RFA): I1-I5 (paired Red & Blue)
 All proposed work is outside of both the 100 foot wetland buffer and 200 foot RDA.

C. Activities within Regulated Areas – Palmer Wetland Regulations – The plans have added the 100-foot buffer to the Lands Subject to Flooding per the Regulations Section (E)(1.). All activities have been identified on the attached plans for clarity and shading used to assist the reviewers to identify the 50 and 100 –foot wetland buffers, the 100-foot land subject to flooding (FEMA Zone AE) buffer and the Riverfront Area RFA 200-foot jurisdiction areas.

Additional plan and activity notes:

- The emergency storm drain outfall discharge/riprap apron from the subsurface infiltration and storage chamber system located under the boat wash area and north of the community center is shown outside of the 100-foot wetland buffer zone. There will be grading, and loaming and seeding beyond the outfall to provide a vegetated swale within approximately 12 feet of the 100-foot buffer zone. No loss of storage volume within the FEMA Zone AE will result.
- Work activities within the 100-foot buffer to land subject to flooding (LSF) on the north side of the site includes the Sales Office, a corner of the Community Center building, parking, grading and lawn/landscaping and storm drainage. The 100-foot LSF buffer below the community center includes a portion of the pool deck, stairs, walkway, grading and landscaping and cottage unit development on the ridge located above and west of the edge of Forest Lake and the LSF elevation of 377.0.
- Work within/below LSF includes the removal of 6 inches of sand/gravel from the former beach area and replacement with 6 inches of new sand. Beach nourishment work is shown both below the NHWM of the lake and above the bank and edge of BVW as shown on the plans. No change in LSF volume will occur.
 - The area of disturbance within the 100 foot buffer to LSF is 138,113 s.f. (See note on left corner of plan sheets).
 - A DEP Chapter 91 permit application will be filed for beach nourishment within the lake and for the temporary (seasonal) dock and swim area buoy line installation.

D. Historical Use – Former Beach Area and former Resort Clubhouse – There was discussion at the November hearing as to the former location of the beach area. Research by the project team has provided aerial evidence of the former waterfront building/foundation location and beach area to the south of the foundation remains of the building. The proposed beach will occupy the location of the

former beach area. Work within the 50- foot BVW zone at the community center area will provide improvements over current conditions with the removal of the foundation/slab system remaining from the former waterfront building and re-vegetating this area with naturalized shrubs and plantings as noted on the plans.

E. Temporary Well – The applicant has proposed a temporary well for the initial project start up to service the Sales Office until the River Street Water and Sewer connections can be constructed. In light of comments from the Conservation Commission, the applicant will not use that well as a permanent irrigation well and will de-commission the well upon connection to public water.

F. Pesticide Use – The applicant will only use limited organic fertilizers for the lawn/landscaped areas according to standard IPM protocols. This information is stated in the Stormwater Management Plan.

G. Community Center Fence at 50-foot Buffer Zone – A fence has been proposed by NHESP and agreed to by the applicant to separate the natural vegetation along the shore from the lawn areas behind the community center. The fence will leave a 6-inch opening at the bottom to accommodate small wildlife.

H. Potential Underground Storage Tanks (UST's) – There was discussion at the Public Hearing of the possible presence of UST's on the property at the former garage onsite. There is a floor drain tight tank located at the building. The applicant has engaged an environmental consultant to perform a site assessment and provide a report of findings.

I. River Street Utility Extensions – The proposed water and sanitary sewer force main services proposed from the site along River Street to Center Street (approximately 1.5+/- miles) will be processed as a separate application to the Conservation Commission and are not under review with this Notice of Intent application.

In response to the proposed, approximately 1.5+/- miles, water and sanitary sewer system extension, the Agent commented why not bring it all the way up and asked if the homeowners and business (Russo's) of the Forest Lake area will be able to tie into the system. She added that her concern is how a lot of the systems are outdated for the people who live there. The Agent explained it would be in the best interest for the health of the lake if at least sewage was tied in to the cottages and Russo's because of the risks associated with a failing septic system. She went on to address there is already evidence of some systems on the other side of the lake that are failing or have failed from the early days of the lake. Therefore, the Agent believes it makes the most sense to tie everyone into sewer because the last thing they want is there to be a failure and something bad to happen to the lake. In terms of sewage extension especially, it's important to look at overall lake health and nutrition and to understand that the worry for pollutants and failing septic systems is high on the list for a direct cause of lake pollution. Steve O'Connell responded he believes it would be significant undertaking to follow through with that request of the Agent. The Agent believes it would be a significant problem if there were to ever be a failure, for example, nobody could swim at the beach if a problem happens with lake pollution. Joe Paolini also believes it would be a large undertaking to meet this request of the Agent. The Agent explained a key element of the MassDEP 604b Water Quality Management Planning Grant is to locate where all of the septic tanks are and review title 5 compliance so that they can acquire funds to help improve the water quality of Forest Lake for the residents, especially if we can secure clean water funds. Joe Paolini stated if the Commission wants to send a proposal to Forest Lake Properties (FLP), then they will look into it. Paul McManus updated the Commission on the specific details about the work done by CMG Environmental, Inc. (CMG) in regard to the underground tank believed to be at the site where the old

barn is located. David Cotter, Vice Chair of the Conservation Commission, came to see the work while it was in progress. The main concern was the question of whether or not there actually is or isn't an old underground tank at this location. It was determined that there is a diesel fuel holding tank located inside of the old barn; it's elevated in the barn as well as up on a cradle and there is a containment vessel below it. Paul McManus explained there is however a floor drain in the barn too and it was determined that the floor drain that was found is an "environmental question mark". CMG couldn't find any records related to the discoveries made in the barn, therefore they went to the barn with a bobcat and began to dig in order to investigate the floor drain. There was a little bit of oil floating on top of the water in the oil separation tank and that is to be expected as well as normal, but the inside of the tank was all water with no trace of oil inside of the tank. CMG stated the liquid in the tank was clearly water and there was no evidence to prove that any water came out of there [the tank]. CMG excavated by both structures [the tank and floor drain] then did a thorough investigation and the results of their investigation was included in a report. The report from CMG was for the two structures [the tank and floor drain] that raised environmentally related concerns. As part of the tank and floor drain report, they ran data analysis and laboratory data. CMG utilized a mini excavator in order to expose the tank because they dug next to it (primarily on one side), got below the bottom of the tank and reached down with the bucket as well as grabbed a clean sample, which is standard procedure; there were a number of containers in the barn, some were empty, some had liquid; CMG stabilized all of the containers and sampled them and did a lab analysis on them in order to dispose of them properly at a disposal facility depending on exactly what the liquid tests out to be inside; no contamination at the barn.

The CMG letter titled Tight Tank System Assessment & Diesel Fuel Tank Removal is as follows...

CMG Environmental, Inc. (CMG) herewith provides a summary of our subsurface assessment of a former oil/water separator and tight tank at the above-referenced property (the 'Site'). It also summarizes removal of a diesel fuel aboveground storage tank (AST) located inside the barn that drained to the tight tank.

TANK & SEPARATOR ASSESSMENT

On January 9, 2019, CMG visited the Site to assess subsurface conditions at the oil/water separator and tight tank locations. Our goal was to identify whether or not either structure was compromised and released any contents to the subsurface. The drain system started with a floor drain located inside the barn on the northerly end of the property. The barn had reportedly been used for automobile service at some point in its history (CMG did not perform a detailed historical assessment of the Site). The drain discharged to an oil/water separator, which discharged to a tight tank. Both structures were behind (i.e., north of) the on-Site barn. CMG uncovered the two structures with an excavator, and observed both to be of pre-cast concrete construction. The oil/water separator was cylindrical, with an outside diameter of 57" and an overall height of 65". It had an inlet pipe located 19" below the top of the tank, and an outlet 30" below the tank top. The tight tank was rectangular, with a length of 8', width of 4', and was 67" deep (i.e., inside the tank itself). There were no baffles within the tank, and we observed the water within to be clear. The tank's top was 29" below grade, and we observed the water level within the tank at a depth of 56" below grade (i.e., water within the tank was approximately 40" deep (roughly 800 gallons). During our excavation we did not observe any visual evidence of leaks from either structure, nor any odor to suggest a release of oil and/or hazardous materials (OHM). CMG collected soil samples from beneath the oil/water separator and adjacent to the southeasterly corner of the tight tank. We submitted them to a state-certified laboratory for analysis of extractable petroleum hydrocarbons (EPH) with target polynuclear aromatic hydrocarbon (PAH) identifications. We requested additional analyses for the sample from

beneath the separator, as follows:

- Volatile organic compounds (VOCs) by EPA Method 8260, which includes typical chlorinated solvents along with gasoline target aromatic compounds;
- Polychlorinated biphenyls (PCBs) by EPA Method 8082, which was sometimes a component of pre-1978 hydraulic fluid; and
- Eight total Resource Conservation & Recovery Act toxic metals (RCRA8), some of which are often present in used engine oil (i.e., waste oil).

The attached table summarizes the results of laboratory analyses. The laboratory did not identify any VOCs, EPH, target PAHs, or PCBs in the samples. They identified low concentrations of arsenic, barium, chromium, and lead that are consistent with naturally-occurring background concentrations (and which are substantially below RCS-1 reportable concentrations listed at 310 CMR 40.1600).

DIESEL AST REMOVAL

CMG planned to remove the diesel fuel AST on the morning of January 22, 2019. However, abnormally cold temperatures prevented our accomplishing this task. We plan to return to the Site on January 24, 2019 to complete the removal.

SUMMARY

CMG assessed subsurface conditions adjacent to and beneath the oil/water separator and tight tank system. We did not identify any evidence of a release of OHM from either structure, and we opine no additional investigation of this system is necessary. Weather conditions prevented removal of the diesel AST as of this writing, but CMG plans to complete the removal by January 24, 2019.

Paul McManus and the Agent walked the wetland flags together because they originally disagreed on the location placement of a few particular flags. The applicant then included revisions as part of the most recent plans set that the Commission received copies of. On a side note, it was brought to public attention that a couple of neighbors witnessed some large bird species recently on site. Paul McManus went out to those areas of concern with binoculars and did not see nests or evidence of nesting, even with a high density of coniferous pine trees.

The first NOI Peer-Review Letter from SWCA came in this afternoon and the letter was dated February 5, 2019. The Conservation Commission and the applicant haven't had a chance to digest it yet because it was received shortly before this public hearing began. Paul McManus doesn't believe there is anything that the applicant is at odds with in terms of what John Thomas went over in the review letter that was sent out today. It's important to note that the offset line that the Agent requested will be included in the next set of revised site plans for the project. John Thomas of SWCA explained the memo review to the Conservation Commission and the applicant and commented that he did receive the stream stats info from the Agent and related photos as well. John Thomas and SWCA were instructed to take a look at the project and provide the Conservation Commission with a comprehensive assessment because the Commission retained them as a third-party peer-reviewer. John Thomas mentioned the Request for Determination of Applicability (RDA) is due to expire, therefore any work has to be done and in compliance before the expiration date (approximately 3 years) as it's possible it cannot be extended with a filed extension.

The NOI Peer-Review Letter from SWCA Environmental Consultants is as follows...

Dear Members of the Commission:

In preparation for the public hearing scheduled for February 5, 2019, SWCA Environmental Consultants (SWCA) is issuing to the Town of Palmer Conservation Commission (Commission) a formal review summary of the Notice of Intent (NOI) application for the Forest Lake Seasonal Cottages Project off River Street in Palmer, Massachusetts.

The project proposes to construct a seasonal cottage community on a 91-acre parcel of land which was previously part of the Palmer Sand and Gravel site. The following resource areas were identified onsite: Bordering Vegetated Wetland (BVW); Bank; Bordering Land Subject to Flooding (BLSF); Riverfront Area; and Land under Water and Waterways (LUW). The following documents were received and account for the information reviewed by SWCA:

EcoTec, Inc. Environmental Consulting

- o Notice of Intent under the Massachusetts Wetlands Protection Act and Palmer Wetlands Protection Ordinance; Proposed Cottages at Forest Lake; Palmer, Massachusetts; Applicant: Forest Lake Properties, LLC dated October 24, 2018.
- o E-file Notice of Intent Form 3
- o Detailed Wildlife Habitat Protection Evaluation
- o Avian Nest Survey Memorandum dated December 5, 2018

Light Environmental Design

- o Letter of Correspondence dated January 9, 2019

Andrews Surveying & Engineering

- o Master Site Plan Set “The Cottages at Forest Lake” dated/ revised January 9, 2019
- o Resource Area Plan Set “Activities Subject to Jurisdiction of Conservation” dated/ revised January 9, 2019.
- o Stormwater Report revised October 23, 2018.

Massachusetts Division of Fish and Wildlife

- o Response Letter dated November 15, 2018 – NHESP file no. 06-21186

Regulatory Compliance

The following municipal by-laws and state regulations were consulted for this review:

- o Town of Palmer Wetlands Ordinance and Regulations
- o Massachusetts Wetlands Protection Act
- o Massachusetts Department of Environmental Protection Stormwater Regulations
- o Town of Palmer Stormwater Ordinance for Large Projects

Request for Determination

The Applicant received a conditioned Negative Determination confirming listed resource areas on the site. The Negative Determination was issued October 17, 2017 and expires October 17, 2020. Please note that once this permit expires the wetland boundaries are no longer valid and a supplemental wetland confirmation would be needed.

Comments

- o SWCA calls to the attention of the Commission that the confirmation of resource areas outlined in the

RDA will expire October 17, 2020.

NHESP Concurrence

On October 24, 2018, the Applicant submitted a copy of the NOI to NHESP and received concurrence on November 15, 2018 stating the project will not adversely affect or not result in a prohibited take.

Comments

o SWCA confirms the presence of a NHESP response letter. The NHESP species is not mentioned within the received correspondence or NOI application.

Notice of Intent Review Comments

NOI Fees

The Commission administers a Schedule of Fees for the submission of an NOI based on the limit of work.

Comments

o SWCA suggests the Commission request the Applicant provide clarification on how the project fees were calculated and to provide a limit of work acreage, as it appears the proposed work within BLSF and LUW is not encompassed.

Land Under Water and Waterways

The Applicant proposes work within Land Under Water and Waterways (LUW). Correspondence received from Light Environmental suggests a “DEP Chapter 91 permit will be filed for the beach nourishment project in the lake and the temporary dock...”. SWCA supports this statement, the NOI proposes activities that are to take place within Forest Lake, which is characterized as a Great pond. Therefore, the Applicant will require authorization from MassDEP in accordance with the Chapter 91, Massachusetts Public Waterfront Act.

Comments

SWCA suggest the Commission request/condition the Applicant provide the following:

- o A site plan establishing the limit and depiction of proposed work;
- o A copy of the authorized MassDEP Waterways Permit;
- o The volume of material to be removed and replaced;
- o The timing/schedule/sequencing of project activities;
- o Details on project sediment and erosion control best management practices;
- o The applicability of a 401 Water Quality Certificate (310 CMR 9.00); and
- o Prior to the issuance of a Certificate of Compliance the Applicant provides concurrence from other “authorities having jurisdiction” for all proposed activities within this NOI.

Beach Nourishment

The beach nourishment project will be undertaken within existing resource areas (ie. BLSF) and associated local and state buffer zones. According to the WPA compensatory mitigation is required for any loss of flood storage capacity. Additionally, the work will require authorization through a MassDEP Waterways Permit.

Comments

SWCA suggests the Commission request/condition the following from the Applicant:

- o A comprehensive narrative which: adheres to Chapter 91 requirements and the MassDEP Best Management Practices; construction timeframe/staging/sequencing; removal and disposal of existing impervious surfaces; materials; licensed contractor; erosion control and environmental monitoring; and, maintenance plan;
- o A comprehensive site plan identifying the volume of: proposed existing structure and impervious material removal; proposed surface material removal; and, proposed replacement nourishment material;
- o Details on project sediment and erosion control best management practices;
- o An as-built survey of the Beach Nourishment project to confirm the work adheres to Chapter 91 MassDEP requirements; and
- o Prior to the issuance of a Certificate of Compliance the Applicant provides concurrence from other “authorities having jurisdiction” for all proposed activities within this NOI.

Degraded Riverfront

The Applicant is claiming 4,100 square feet of degraded Riverfront Area on site. According to 310 CMR 10.58 (5) a previously developed riverfront area contains areas degraded prior to August 7, 1996 by impervious surfaces from existing structures or pavement, absence of topsoil, junk yards, or abandoned dumping grounds.

Comments

- o SWCA recommends the Commission request that the Applicant provide additional information to support this claim. A review of the area in question (Google Earth Imagery) appears to indicate that it was vegetated by coniferous forest in 1997.
- o Should the area in question meet the definition of degraded Riverfront area prior to August 7, 1996, SWCA also recommends that the Commission consider the criteria put forth in 310 CMR 10.58 (5)(a-h).

Riverfront Area

Mean Annual High-Water Line (MAHWL)

The Applicant states that the Riverfront boundary onsite coincides with the transition from aquatic to terrestrial land.

Unnamed Perennial Stream

Upon review of the confirmed and unconfirmed resource areas present, it is SWCA’s opinion that the Riverfront Area north of BVW Flag WF C14 should coincide with the delineated BVW “C” series. SWCA acknowledges that the Applicant is siting beaver activity as the cause of observed flooding activity on site.

Ware River

The site plan set shows the limits of work extending up to 30-feet beyond the property line along the western portion of the property approximately parallel to River Street. The NOI application will require landowner signatures for this proposed work.

Comments

- o SWCA recommends that the Commission request the Applicant provide evidence and visual confirmation that active beaver dams are restricting or impairing the natural flow patterns of the stream.
- o SWCA recommends that the Applicant include the locations of beaver dams on the site plans.
- o SWCA recommends that the Commission request the Stream stats information highlighted within the

NOI, and additional information regarding the depicted MAHWL boundary of the Unnamed Perennial Stream.

- o Pending the expiration of the Negative Determination, SWCA suggest the Commission re-evaluate the established boundary of MAHWL of the perennial stream south of Flag WF C14.
- o SWCA recommends that the Commission request an overall breakdown table of impacts of proposed work within this resource area. It is unclear if the calculation of area includes the off-property area shown as being within the limits of work along River Street.
- o The Applicant notes in their alternatives analysis that grading or armoring of the slope on site were rejected for “failure to be economically similar and provide less protection to the RFA resource area”, but provides no details of potential costs for these activities or full discussion of how they would provide less protection for the RFA.
- o SWCA recommends that the Commission review the planting plan details for work in Riverfront.

Wildlife Habitat

A SWCA Wildlife Biologist reviewed the NOI for compliance with the WPA performance standards. A Detailed Appendix B – Wildlife Habitat Evaluation - is required for impacts which exceed thresholds, as outlined in the *Massachusetts Wildlife Habitat Protection Guidance for Inland Wetlands* (310 CMR 10.60) including:

- o impacts to **Bank** resource areas which exceed 10% of the length of the Bank on a single lot or 50 linear feet, whichever is less [310 CMR 10.54(4)(a)5],
- o impacts to **Land Under Water** (LUW) which exceed 10% of the LUW on a single lot *or* 5,000 square feet, whichever is less [10.56(4)(b)],
- o impacts to **Riverfront Area**, depending on the size of the project and the activity [310 CMR 10.58(4) and 10.48(5) and 10.58(6)], specifically if the Riverfront Area is previously undeveloped and within Habitat of Regional or Statewide Importance.

The Appendix B form is used to identify significant habitat features present within the impact areas and to demonstrate whether the proposed project will result in a no adverse impact to wildlife habitat or to make recommendations for mitigation, if necessary. The Appendix B form is necessary when impacts to resource areas (described here) exceed these thresholds, occur within Habitat of Regional or Statewide Importance, or impact Vernal Pool Habitat. The NOI submitted by EcoTec, Inc. describes proposed impacts to resource areas; however, the thresholds for impacts are not reached for Land Under Water since the LUW impacts are estimated to be <5,000 sf, and impacts to Riverfront Area do not trigger the Appendix B forms even through impacts to undisturbed Riverfront Area are estimated to be over the 5,000 sf threshold because the area is not within Habitat of Potential Regional or Statewide Importance (DEP CAPS Program) or certified/documented Vernal Pool habitat, and therefore only an Appendix A checklist is required.

There are inconsistencies within the Appendix B forms. The title page lists the three resource areas which have proposed impacts. There should be a unique set of data forms for each of the impacted resource areas. However, as discussed above (and described in the NOI), the Appendix B form is not required for impacts to LUW since they do not exceed thresholds, and the impacts to Riverfront Area are not within Habitat of Potential Regional or Statewide Importance or VPs, even though they exceed 5,000 sf threshold. Therefore, they are only required to do the Appendix B Form for Bank impacts.

The wetland classification system was used to describe onsite areas as “Lacustrine” with a “Littoral” Subsystem, an “Unconsolidated Bottom” class and a “Sand” subclass with a “permanently flooded” hydroperiod. This appears to be describing the LUW resource area. Bank should be classified as having an “Unconsolidated Shore” class and either a “temporarily flooded” or “seasonally flooded” hydroperiod if vegetation covers less than 30% of the shoreline. The terrestrial classification of the Riverfront Area is described as “Eastern White Pine Forest” along the “Riparian Zone”. While descriptive, this does not follow the Natural Communities of Massachusetts classification system.

The Vegetation description in the data form appears to be describing the Riverfront Area, but this remains unclear. The photo pages illustrate a bank with a sandy shoreline vegetated with saplings, shrubs, and forbs. Page 3 of the Appendix B data form describes the resource area as having 90% canopy cover of eastern white pine trees, 10% cover of northern bayberry shrubs, and 10% cover of American wintergreen in the herbaceous layer. This section should describe the Bank resource area only, as that is the resource area where impacts exceed thresholds. If, as described earlier in the form, the classification is Unconsolidated [Shore] then there should be <30% vegetation cover.

In general, additional description is expected to accompany the Appendix B data forms if important or significant habitat features are present, such as (but not limited to) turtle nesting areas, eagle nests, or otter dens. The Applicant identified such significant wildlife habitat features (including turtle nesting habitat) but did not include any supporting text to describe those features beyond the form. Additional information on impacts to turtle nesting habitat, bat roosting trees, standing water that could be used by waterfowl or breeding amphibians (i.e., American toads), should be described in greater detail to demonstrate compliance with the ‘no adverse impact’ standard, or mitigated for, if necessary.

There is an accompanying report detailing avian nests, including eagles, osprey and great blue heron dated December 5, 2018. The report documented there are no nests present for these species. The project area is located within Priority and Estimated Habitat of Rare Species. EcoTec has supplied a response letter issued from the NHESP describing their ‘not take’ response.

Comments

o SWCA suggest the Commission request the Applicant revise the Wildlife Evaluation forms and identify the NHESP “PH 1087” mapped species. The forms do not state the established beaver lodges are more than 100 feet from the proposed work.

Buffer Zones

In accordance with the Palmer Wetlands Regulations, the 50-ft vegetated buffer strip setback also applies to BLSF.

Comments

o SWCA recommends the Commission request the Applicant revise the plans to accurately depict the local 50-foot buffer zone.

Wetland Delineation Field Review

o The smaller side of Forest Lake, the other part divided by the rail line, resource area delineation was reviewed by SWCA. These resource areas are acceptable as flagged in the field and the associated buffer zones are acceptable.
o Flags D1 through D14 are not depicted on the provided Wetland Resource Area Site Plans. SWCA

assumes that these flags are not subject to review and therefore these flags were not reviewed in the field. SWCA recommends that the Commission request a review of these flags if they are indeed relevant to the proposed project.

- o Riverfront area north of flag WF C14 should be coincident with the Wetland C flag boundary.

Desktop Resource Area Review

BLSF – according to FEMA FIRM Maps 25013C0254E and 25013C0258E effective 7/16/2013 the established floodplain elevation for the site is 377.0 feet.

- o SWCA suggests that the Commission request the Applicant provide the established site plan set (NGVD29 or NAVD88) datum to confirm the BLSF resource area boundary.

Isolated Land Subject to Flooding- the site plans do not appear to contain any isolated depressions which would be jurisdictional under WPA.

L UW- The Bank of Forest Lake is assumed to be the MAHWL of the waterbody. Any proposed work down gradient of delineated bank is considered LUW.

Stormwater Report

The stormwater report was reviewed in accordance with the Massachusetts Department of Environmental Protection Stormwater Regulations and the Town of Palmer Stormwater Management Ordinance for Large Development Projects. SWCA finds the Applicant proposes an acceptable stormwater management system and features included with the project.

SWCA suggests the Commission consider requesting the following from the Applicant:

- o Revising the HydroCAD models to show the total area analyzed is equal for existing and proposed conditions; and
- o Revising the proposed conditions watersheds models, which have direct entry time of concentration values. Please clarify the assumptions for these watersheds and add notes to the mapping identifying which sub-watersheds having direct entries with flow paths shown for the remaining areas.

The Agent questioned about the beach nourishment by asking if the applicant is dredging or hydroraking and if so has that information been included in the Notice of Intent (NOI). The reason she is concerned about that specific kind of work in Forest Lake is because without it the future residents of the cottages would be swimming in a lake of milfoil, lily pads, etc. That aquatic vegetation is not as bad in that area, but they would certainly have to go out a certain distance from the shore in order to clear the water of it. Rick Licht stated he will quantify that in their report and the Agent responded they will also have to do weed management in that area, which will alter the thresholds for Land Under Water (LUW). The Agent added that in doing so the applicant is going to be disturbing the LUW by pulling up the vegetation to allow people to swim in the water by the beach and so the applicant will look into the amount of aquatic vegetation exists in the lake nearby the beach area.

The Agent asked approximately how long the project is expected to take time wise and Joe Paolini said it depends on the economy and market. The Natural Heritage phase ends in 5-years, the Order of Conditions (OOC) ends in 3-years and is only allowed one 3-year extension, therefore the applicant would have to go through it again if their timeline exceeds the aforementioned number of years. What the Commission would approve would only be good for 6-years, therefore if the project is not completed within 6-years then the entire proposal for the entire project will have to be reapplied to the

Conservation Commission as well as Natural Heritage. Given the scope and scale of the project, the Conservation Commission is in agreement to look into the cumulative impacts of the project because it is written in our local ordinances for conservation.

Christina Pike of 631 River Street questioned whether or not the currently eroded dam will be able to handle the impacts from construction and if it can handle additional stress, specifically because if the dam blows out than the whole lake doesn't exist. She also discussed her confusion on why they were denied permission to remove the berm in the past from Massachusetts Department of Environmental Protection (MassDEP) and the United States Army Corps of Engineers (USACE), but yet this project will proceed with the berm removal.

John Thomas of SWCA mentioned it is a concern that a significant amount will be cut from the berm structure and so it's something to be looked at more closely too. He added that the applicant's reasoning for making the cut has to be included as well, especially because it's a lot of earth removal.

Motion made by Dorothy Lawrence to continue the public hearing to Tuesday, March 19, 2019 at 7:00 pm.

Seconded by Brenda Cole.

No further discussion – 6-0-0 – Motion Carries.

9. Requests for Certificate of Compliance: No Requests for Certificate of Compliance.

10. Project Monitoring

a. DEP #256-0331: 271 Breckenridge Street Solar

David Cotter stated the last time he walked the site there were rut areas near the solar panels as well as a nearby "U" that re-directed the water to collect in one area and the applicant added more "U's" upon his arrival. He noticed many water problems, especially because of the low basin retention quality and quantity. David Cotter likes the idea of the mulch piles on this site because it filters the water and they are part of a large buffer area. He doesn't know how well it works to retain wetland areas, but the mulch areas will break down and become a good top soil for the site. David Cotter explained they are massive piles approximately 4-feet tall and 9-feet wide; essentially giant check dams made out of wood (mulch). He said one of the mulch piles breached in a spot where there was a higher concentration of water and a higher flow rate, therefore the water went over the top of that pile. The mulch being a woody product it sent out a dark brown silt from the woody debris that physically ends up in as well as appears visibly in the water. David Cotter mentioned one of the silt fences have been stressed out considerably, so the applicant agreed to replace or reinforce the problems areas in certain sections; sections they had marked out for the fence that were weakened from stress. Water also collected in areas where dirtbike tracks were identified and eroded that part of the trail very fast.

11. Violations & Enforcement

a. Enforcement Order – DEP #256-0332: L12 Breckenridge

The Agent stated the detention/retention ponds or erosion controls or sediment traps are too small and were definitely undersized at the time that she performed the most recent site visit. She noticed significant slope areas with no construction Best Management Practices (BMPs), causing discharges of filthy water to enter the brook and come down the road. The applicant was told to add flock logs and they haven't done that as of yet. The Cold Water Fisheries (CWFs) expert of the state said they did not exceed the impact threshold of concern.

b. L65 Bennett Street

The Agent & Commission performed a site visit to the property to ensure that the property owner and Conservation Commission were on the same page in terms of what the restoration/work expectations were. During the site walk he said he would first obtain a burn permit and then burn the mulch in order to avoid transport of it off-site. The Agent is still unsure of his intentions because he has not been very clear about what his future plans for the land are. As it stands he will solarize the areas of Oriental Bittersweet, then mulch and seed, for his invasive species management. On a side note, a piece/slab of concrete slipped into water, but will wait until summer to remove when drier exposed on the site

c. 12 River Street Solar

The Agent stated the applicant submitted new plans to the Planning Board to install basins sized for 100-year storms. The plans are under review by the Planning Board engineer. The Agent & Commission will actively monitor the site over the winter. The applicant will have to re-submit a plan to the Planning Board for stormwater management for approval as well.

d. Katie Lane

The Agent contacted Mr. Morrison because a lot of water was coming off Lot #8. He then came to dig out the detention basin once again because the pond was overflowing causing water runoff down the road all the way down to the fish hatchery as well. Dan from the hatchery called and explained how the water from Katie Lane was getting into the fish hatchery ponds again. On behalf of the hatchery they expressed concerns about the dirty water runoff entering into their ponds and slopes. Mr. Morrison remedied the water problem within an hour and a half.

e. 110 Rondeau Road

The Agent is unsure of exactly what has happened there. The complaint received from an abutter was that the well was installed incorrectly and it has a leak. Josh Mathieu from the Board of Health said it's essentially impossible because then they would not have any water whatsoever at all for sure. Members of the Commission said the underlying issue could be that the well has too much pressure and is therefore pushing the water out. The complaint was turned over to the Board of Health and Josh Mathieu will do a site visit.

12. New/Old Business

a. MVP Public Listening Session Monday 4/8/2019

Reminder.

b. TRACK Saturday 5/4/2019

Reminder. Need to schedule shifts for the ConCom tent as soon as possible.

c. Trail Grant for MCR Extension

Submitted.

d. MACC AEC Saturday 3/2/2019

Reminder.

13. Office Closed: Tuesday, February 26 & 27, 2019.

14. Set Next Meeting Date: Tuesday, March 5, 2019 at 6:30 pm.

15. Meeting Adjourned: 10:39 PM

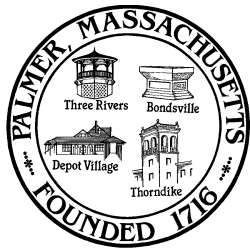
Motion made by Dorothy Lawrence to adjourn at 10:39 PM.

Motion was seconded by Nicholas Zeo.

No further discussion – 6-0-0 – Motion Carries.

Sincerely Submitted,

Jeff Stanhope
Palmer Conservation Assistant



TOWN OF PALMER CONSERVATION COMMISSION

Meeting Documents

Tuesday, February 5, 2019 – 6:30 PM

LOCATION: Town Administrative Building Meeting Room

Donald Blais, Chair
David Cotter, Vice Chair
Peter Izyk
Nicholas Zeo
Brenda Cole
Dorothy Lawrence
Mike Swiatek

Angela Panaccione, Agent
Sarah Fortune, Assistant

The following is a list of documents used at the above-mentioned meeting, in addition to those included in the agenda packet which is part of the official record of the meeting:

Number	Description	Agenda Item	Notes
1.	Approval of Meeting Minutes: 1/22/2019	Approval of Meeting Minutes	Retained in 2019 Minutes binder in office
2.	Forest Cutting Plan Review: Ware Street	Review Mail/Phone Messages	Retained in Forest Cutting Plans by Street in office
3.	Notice of Intent (NOI), site plans & associated documents: DEP # 256-0338 – 1235 Thorndike Street (Map 73-58); Altitude Organics	Schedule of Public Meetings & Hearings	Retained in file for DEP # 256-0338
4.	Notice of Intent (NOI), site plans & associated documents: DEP # 256-0339 – 1117 Ware Street (Map 37-39); single family home construction	Schedule of Public Meetings & Hearings	Retained in file for DEP # 256-0339
5.	Notice of Intent (NOI), site plans & associated documents: DEP # 256-0336; Forest Lake Seasonal Cottages – Off River Street & Forest Lake Road (Map 36-86, 31-1-1, 30-11-5)	Schedule of Public Meetings & Hearings	Retained in file for DEP # 256-0336
6.	Monitoring Reports: DEP # 256-0331; 271 Breckenridge Street (Map 19-60)	Project Monitoring	Retained in file for DEP # 256-0331