



City of Cambridge Conservation Commission

147 Hampshire Street
Cambridge, MA 02139
Ph. 617.349.4680

Jennifer Letourneau, Director

jletourneau@cambridgema.gov

Public Meeting – Monday, October 25, 2021 at 7:00 PM Zoom MEETING MINUTES

The following meeting minutes were taken by Tracy Dwyer and are respectfully submitted.

Present Commission Members: Jennifer Letourneau (Director), Purvi Patel (Chair), David Lyons (Vice Chair), Kathryn Hess, Michelle Lane, Elysse Magnotto-Cleary, Kaki Martin

Absent Commission Members: Erum Sattar

Attendees: Tracy Dwyer, DPW; Jim Wilcox, DPW; Howard Moshier, VHB; Eileen Piskura, Kleinfelder; Betsy Fredrick, Kleinfelder; Christopher Wagner, VHB; Brian Fairbanks, VHB; Brian Montejunas, Kleinfelder; Jennifer Swwet, Haley & Aldrich; Joseph Capellino, VHB; Anthony Galluccio, Galluccio & Watson; JP Shadley, Shadley & Associates; Tom Moseley, Shadley & Associates; Jamy Madeja, Buchanan & Associates; Chrissy Gabriel, IQHQ; David Surette, IQHQ; Andrea Yakovakis, Carmen Chan, Tom Gould, Judy Silvan, Suzanna Schell, Vicki Paret, Margaret Desjardins, Carol Waldo, Susan Hall, Amy Kipp, Anisha N, Bonnie Kwan, David Bass, Emmett Vorspan-Stein, Eppa Rixey, Eric Grunebaum, FS, Guillemette Simmers, Hannah Goodwin, James Williamson, Julie Ray, Kelly Matthews, Diane Martin, Lewis Weitzman, Lois Markham, Marie Ariel, Matt G, McNamara Buck, Mike Nakagawa, Neheet Trivedi, Rachel DeLucas, Reva Stein, Ronald Moulton, Shane Kelly, C. Coleman, David Croce, Gretchen Friesigner, Joel Nogic, John Doucet, Donna Karl, Kathy Johnson, Matthew Greif, Michael Brandon, Peggy Barnes Lenart, Renata Pomponi, Sandy Durmaskin, Lisa Birk, Leonardi Aray, Jim Eggleston, Emerson Gagnon, Gatherine Zusy, Alida Castillo

Purvi Patel opened the meeting.

7:01 – Notice of Intent

IQHQ Alewife Park – Redevelopment and Restoration
1 Alewife Center

David Lyons, Vice Chair of the Conservation Commission meeting chaired the meeting. Howard Moshier from VHB introduced the IQHQ project. Howard stated that this Notice of Intent is for the property in North Cambridge, four parcels to the north of Whittemore Avenue, Alewife Brook Parkway to the west, Russell Field, Harvey Street and Clifton Street to the east and the MBTA headhouse to the south. This development consists of multiple buildings, ranging in size,

age, and use. The 1 Alewife Building and Building #29 (to be renamed Building #2) will remain, but there are other buildings that will be demolished. Howard pointed out that this land consists of a lot of buildings and a lot of hard top surfaces. Most new buildings will be built over footprints and parking, except for the proposed parking garage which will be over some parking space and green space. Howard stated in the new buildings #3, 4, and 5 green roofs and purple roofs will be replacing the standard roofs. Purple roofs are roofs that are like the green roof and blue roof, with stormwater management and green roof with plants and trees, solar canopies will be provided in parking areas and the top level of the garage will be a tree nursery. The development footprint with buildings 3, 4, and 5 is roughly about 350,000 square feet, 2100 square feet is in the garage. They are here because of bordering land subject to flooding, also in the floodplain. They are reducing the impacts to several trees and providing compensatory flood storage in the garage area. There is also work in the 100-foot buffer zone on the west side and trying to pull back work in that area. Stormwater management report, reducing surfacing parking, central concourse will be permeable surfaces to reduce stormwater runoff. The buildings are elevated for the 2070 sea-level rise. There will be 4 acres of continuous green space near the alewife.

Eileen from Kleinfelder offer a third-party peer review of the Notice of Intent. Her primary focus was around contaminated soil, as it is an AUL site and how it will be handled and disposed of. They were also concerned about the construction sequencing to make sure the filling floodplain doesn't outpace the compensatory flood storage. They also want to make sure that contact has been made to the MBTA since the work being proposed will be happening above their easement. She also wanted to make sure the tree and planting plans had a restoration monitoring plan, and invasive species don't reestablish.

Howard Moshier stated that they just received the memo from Kleinfelder so they will be responding in writing.

Jennifer Sweet from Haley & Aldrich, yes there is a AUL for this site and there is a RAM plan for the contamination. This RAM plan will address all the AUL plans. The AUL will be maintained for the site.

David Surette stated said they will have a LSP on site and will be work under containment with a trucking and construction management plan in place. He said that they will be making sure that they have compensatory flood storage in place before filling in during construction. They have also been meeting with the MBTA to discuss construction and headhouse.

Also, there was also a comment letter from GeoInsight which was hired by the neighbors. Mike Nakagawa went through the key points. Clarification of numbers that were inconsistent in NOI, there were issues with the stormwater issues. They appreciate the efforts to control stormwater runoff. IQHQ has been working with neighbors and meeting with them. They have talked with them regrading containments and minimize the soil disturbance because there is a nearby sports field that is heavily used by children. Using land near Jerry's Pond for compensatory storage. They also said other sites have provided compensatory storage for the 2070 storm and they were hoping the City would have them offer that. They also want to see the number of trees impacted onsite to be at a minimum. The neighbors would like to review the final plans so they would like the commission to continue the hearing.

David Bass stated that he is happy with IQHQ and their efforts to work with the neighbors. They would like to reduce the disturbance of trees and containment soil. He stated that the southwest

corner of Jerrys Pond and removal of soil to use for the compensatory storage, would be a great benefit. He also suggested lowering Harvey Street to get the compensation there and use the grassy area by lowering it near Linear Park. This would need cooperation from the City and MBTA.

Howard Mosier stated that the preference would be design point A, which sends stormwater north to Whittemore Avenue. They need to be careful that the site still floods the same as it does today. Howard said they are still committed to working with the neighbors to come up with the best solution.

Kathryn Hess was intrigued by the separation of the northern and southern part of the development to allow time to think about what to do with Jerry's Pond. Kathryn was at the site walk on October 22, 2021 and said it was helpful to see the site. She was happy to see the neighbors working well with the design team.

Elysse Magnotto-Cleary said she was also interested in the north and south separation like Kathryn. She also said with the continuance which probably will happen with this meeting what does that mean for the coming weeks?

Kaki Martin has no questions currently. She would like to process the memo.

Michelle Lane was interested in the next steps for the continuance.

David Lyons is there any another city process? Jennifer Letourneau stated that they would go o the Planning Board next and stormwater control permits would need to be obtained from DPW.

Questions from the public in the Q & A:

Anonymous: "What kind of kind of biological science labs/companies will be located in the development? Are the buildings designed to prevent any biohazards/toxins/genetically engineered viruses, etc. from being released into the environment?"

David Lyons said this is not the jurisdiction of the Conservation Commission.

David Surette stated there will be no SEL 4 or hazardous type of tenants.

Ann Sweeney: "Can you please address the profound loss of significant trees on this site? We cannot afford more destruction of Cambridge's tree canopy, especially after the loss experienced at the Tobin School."

Howard Moshier stated that we have worked and continue to work with the community regarding this.

Mike Nakagawa: "Why would limited activities at Jerry's Pond included in this NOI preclude future activities on a future NOI?"

David Lyons stated he wouldn't see why they would, to do to the work at the southwest corner.

James Williamson: "Explanation of 'outpace City's 25-2 stormwater standard?'"

Jim Wilcox stated the 25-2 stormwater standard is to compare the twenty-five-year storm to the existing two-year storm. They will be doing that by stormwater detention on site. They want to be sure that they are meeting this standard at each phase of construction.

Howard Mosier stated that is how they read that comment and will address that. The NOI plan that was submitted to the commission plans for planting 587 new trees on site, Howard wanted that read into the record.

David Surette stated that they have been very committed to saving as much trees as possible.

Anthony Galluccio said he is expecting that this would get continued, but he feels very good that this is an improved eco system but would like to give more details in the next hearing. We understand that all trees need to be saved and they are working towards that and have a great plan for planting trees and improving the eco system.

Donna Karl: “What does it mean that Jerry’s Pond has been separated from the IQHQ site? And why has that decision been made?”

Jennifer Letourneau stated that they mean that Jerry’s Pond has been separated from the Notice of Intent, which is the document that is submitted to commission. The is paperwork that is provided by the Department of Environmental Protection, the Notice of Intent paperwork delineates the work zone.

Anthony Galluccio stated that they have been clear about working with the community on Jerry’s Pond. They need to move forward with part of the project that will bring in revenue so that they can work on the public improvements on the site. They are still working toward all of the public improvements to Jerry’s Pond and Route 16 but they need to move forward with the revenue making part of the development and have not removed these items from their special permit.

Catherine Zusy: “Great work. Please maximize tree planting, wetland creation and ecological restoration, especially along Rindge Ave where people live. Please be sure to explore the ecological restoration of the pond, especially along Rindge.”

David Lyons asked about the special permitting and what it is for.

Anthony Galluccio stated that it is article 19 special review because they are adding 50,000 square feet or more to the site. They included the existing buildings to benefit the community. Howard also stated it’s also because they are in a flood plain as well.

Anonymous Attendee “Do you have awareness that replacement trees will take 30 years or more to mature and this area will be a heat island during this 30-year delta?”

Howard stated they are working hard on saving trees on the property, but they are equally excited to be removing a lot of blacktop on the site and adding solar canopy to reduce heat island effect. They will be adding bio solar roofs, green roofs in addition to planting hundreds and hundreds of new trees and permeable areas.

James Williamson “Any public comment will come following these chat questions correct?”

Michael Brandon “Is IQHQ reimbursing the commission for Kleinfelder’s review?”

Jennifer Letourneau stated no. David Lyons stated there are application fee’s but with these larger applications the City can seek on outside review.

Eric Grunebaum stated he is on the leadership of Friends of Jerry’s Pond and appreciated the meetings with IQHQ and different neighborhood groups. He said we should be mindful of Jerry’s Pond since this is a unique body of water and they discovered that this pond is less contaminated then originally thought. The original site was paved, it would be unfortunate to leave this in pavement. Friends of Jerry’s Pond agrees to save as many trees as possible. When it comes to planting trees to think about shade trees for people especially along Rindge Ave.

Michael Brandon asked about the buildings that were once owned by Grace and asked if they are still occupied.

Chrissy Gabriel from IQHQ stated JCP is vacating the building and One Alewife still has occupants.

Michael asked about the caliber rate and height. He would request trees as large as possible to survive we need to protect and enhance the tree canopy as much as possible. Michael also asked about Kleinfelder fee's and thought there was a provision that the applicant would need to pay.

Jennifer Letourneau stated that this was a choice that the City made to be consistent with other larger projects and the City has the money to pay for it.

Michael asked IQHQ if they would be willing to reimburse the City.

David Surette stated that they are happy to work with the City and would be happy to pay.

James Williamson lives in Jefferson Park, which will be demolished soon and has come to love the neighborhood and comes to think that he might not be here for a few years. He stated there has been a great collaboration with neighborhood groups and IQHQ. One key issue is this southwest corner of Jerry's Pond and understands it's not in this NOI delineation. He wants to preserve this; this is where the music hall was and lots of famous people rehearsed.

Questions from the public in the Q & A

Lisa Birk: "Shout out to Reservoir Church members, who have also been a key neighborhood partner collaborating and problem-solving with Friends of Jerry's Pond, alewife Study Group and others."

Joel Nogic from Clifton Street a neighbor for twenty-nine years and founder of the Alewife Studying Group. The key main point was that this meeting would be continued so IQHQ could work on the updated plans. The IQHQ team has been excellent to work with the group had proposed green roofs and tree farm and they listened. Their hope is that commission would allow IQHQ to use the southwest corner for flood storage even though it's not included on this NOI.

Jennifer Letourneau has shared all the comments with the proponents and can share with the public.

Joel Nogic: next steps propose a process by email how long should we have till the next meeting? How long will it take IQHQ and neighborhood groups to work on comments.

Jennifer Letourneau stated the next meeting is November 15th but some large projects like this have had a special date.

Kaki Martin wanted to state that she heard that in the next meeting JP Shadley will be presenting their plan and would like to suggest that not only to they show the existing conditions but take everyone along on not only day one but over the year and also the strategies that the landscape team will take in planting this development. Kaki suggested showing the species, the growth rate of the species due to the comments and the continuance of the comments on the trees and the tree canopy, not just include a planting list and plan.

David Lyons agrees with Kaki Martin and the next meeting after November would be December.

JP Shadley stated that he wants to give and thorough and thoughtful presentation. Just recently they have met with the groups about saving trees. Bigger trees are great but smaller tree's will be bigger over time. JP wants to give a thorough presentation at the next meeting.

Kathryn Hess asked who has sign off authority for the plan to remove and plant new trees.

Jim Wilcox stated the project will need to abide by the City's Tree Ordinance, through the Planning Board and then when trees are being removed permits would be issued by DPW.

Public comment remains open.

8:35 – The commission unanimously agreed to continue the hearing to November 15th or later.

8:39 – Administrative Topics

Meeting minutes from September 20, 2021 – approved

8:42 – Meeting Adjourned



City of Cambridge
Conservation Commission
 147 Hampshire Street
 Cambridge, MA 02139
 Ph. 617.349.4680

Jennifer Letourneau, Director

jletourneau@cambridgema.gov

CERTIFICATION PURSUANT TO G.L.c.39, SECTION 23D, THE "MULLIN RULE," OF PARTICIPATION IN A SESSION OF AN ADJUDICATORY HEARING WHERE THE UNDERSIGNED MEMBER MISSED A SINGLE HEARING SESSION

I, Erum Sattar (name), hereby certify under the pains and penalties of perjury as follows:

1. I am a member of the following adjudicatory body, board or commission

Cambridge Conservation Commission

2. I missed a hearing session on the matter of IQHQ NOI

which was held on 10/25/2021.

3. I reviewed all the evidence introduced at the hearing session that I missed which included a review of (initial which one(s) applicable):

- a. _____ audio recording of the missed hearing session; or
- b. _____ video recording of the missed hearing session; or
- c. _____ official transcript of the missed hearing session.

4. I reviewed the evidence on 11/15/2021.

This certification has been executed prior to my participation in the vote on the above matter. This certification shall become a part of the record of the proceedings in the above matter.

Signed under the pains and penalties of perjury this 29 day of Nov, 2021.

**Signature date must be prior to the date the Board votes on the matter.*

Erum K. Sattar

 Signature of Member

Received as part of the record of the above matter:

Date: 11/29/2021

By: Jennifer Letourneau

Position: Director of Conservation Commission

Alewife Neighbors, Inc.

Cambridge, MA 02140
info@AlewifeNeighbors.org

Alewife Neighbors, Inc.
c/o Mike Nakagawa
51 Madison Avenue
Cambridge, MA 02140
mike@alewifeneighbors.org

October 25, 2021

Cambridge Conservation Commission
c/o Jennifer Letourneau, Director

re: Notice of Intent
IQHQ Alewife Park
1 Alewife Center
Cambridge, MA 02140

Dear Conservation Commissioners:

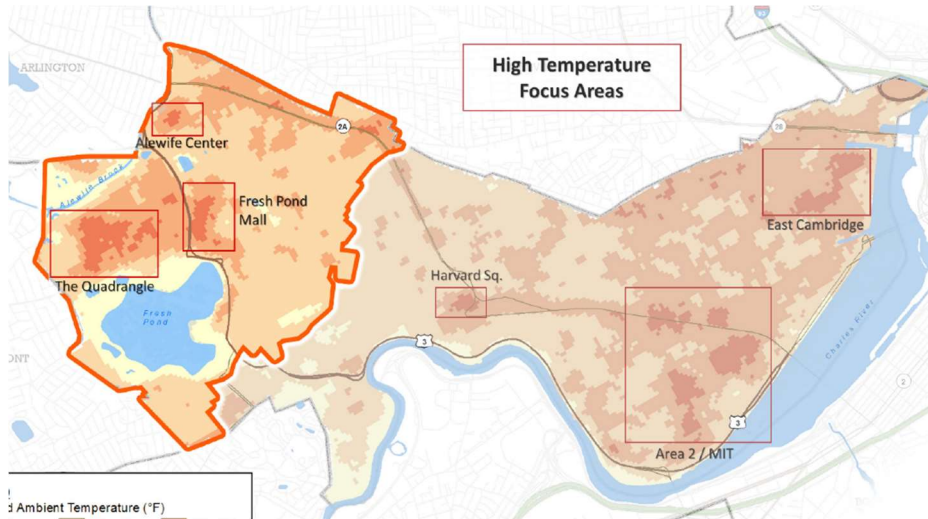
Alewife Neighbors, Inc. (ANI), on behalf of the North Cambridge community in the Alewife area, has retained GeoInsight to review the Notice of Intent (NOI) submitted by IQHQ for their proposed project between Russell Field and Alewife Brook Parkway. ANI also respectfully submits the following observations and comments for your consideration in relation to the application.

ANI is aware that since the time of the filing of the NOI, the Alewife Study Group (ASG) – who has been in frequent discussions with IQHQ over to past several months to represent neighborhood concerns - has been meeting with the property owner, IQHQ, regarding the regrading plans and has made suggestions to which IQHQ has been responding with significant changes to their plans. ANI requests that the Commission continue the hearing to allow the community to review and respond to the final version of the updated plans before a decision by the Commission is made.

I have been involved in the discussions with IQHQ and would like to elaborate on some of the concerns, as a member of some of the City's Climate Change Preparedness and Resilience Planning. I have been a member of the City's Climate Change Preparedness and Resiliency Planning Alewife Focus Group and the Climate Resiliency Zoning Task Force, as well as the Envision Cambridge Climate and Environment Working Group, and have attended most of the Urban Forest Master Plan and Tree Protection Ordinance meetings, so I understand the complexities this site presents. Initially, flooding had been the City's primary concern regarding climate change, but the City's Climate Change Vulnerability Assessment highlighted that extreme heat will become a more serious issue in the near future, so that needs to be balanced in the environmental considerations.

For example, According to the Cambridge Climate Change Preparedness and Resilience Alewife Preparedness Plan, published in 2017), this site, identified as "Alewife Center," was identified as one of the six High Temperature Focus Areas in the city (Figure 4 of the document). We appreciate that IQHQ has committed to using green, Purple, and BioSolar roofs to help with the mitigation and resiliency with

Alewife Neighbors, Inc.



respect to extreme heat as well as other climate change impacts. Another of the key heat mitigation measures for the area is tree canopy coverage (Strategy D1). There should be attention to avoid diminishing the local urban forest, and removing mature trees and replacing them with smaller should be minimized.

Since the time the NOI had been filed, ASG has been working with the developer to protect more of the 218 mature trees ("significant trees" defined as six inches or more in diameter by the Tree Protection Ordinance) identified for removal as part of their initial plans, and IQHQ has made substantive changes that have resulted in significant gains made by reducing the areas that will be re-graded to meet the flood compensation requirements. While adding new trees to replace lost trees is encouraged, the value of the canopy of mature trees while waiting for newly planted trees to grow should be considered. The Urban Forest Master Plan Technical Report indicates that unless the rate of tree loss in the city is diminished, to meet our canopy goal of having the same coverage as in 2009, we would need to plant 4000 trees, per year, every year for the next 50 years.

Reduction of the areas that will be disturbed will also limit the risks of exposure that could come from digging the stable, buried asbestos in the soil next to the Russell Field Youth Recreation Area that abuts the development area. Children are at a particular risk for asbestos exposure, and because of the nature of asbestos as a contaminant, deeply buried asbestos with monitoring and maintenance of the protective cover (as required by the Activity and Use Limitations filed with the State for the site) will ensure the community remains safe from health risks in the future. Additionally, reducing the area of soil disturbance may also protect the smaller trees not identified in their tree survey.

Part of the discussion for minimizing soil disturbance and tree loss involved the slight reduction in additional flood storage as part of the development, while still meeting all requirements for compensatory storage. ASG feels that with the extensive nature of area flooding, a slight reduction in additional flood storage is offset by the benefits of saving selected areas of existing trees and minimizing the risks associated with disturbing the contaminated soil.

Alewife Neighbors, Inc.

Another topic of discussion was the inability to meet the City's 25:2 stormwater runoff standard for development projects, as noted by GeoInsight. The proposed conditions in the original NOI filing show that compensation in the isolated lower elevations on the site were connected to the culvert area in an effort to allow earlier activation of flood storage on the site from backflow from Alewife Brook during storm events. ANI believes that as long as the incremental compensatory storage requirements are met, available storage during the largest storm events, which affect the neighborhood, is more important than activation of storage at lower elevations.

As you may be aware, during large storm events, drainage from the Upper Mystic River backflows into Alewife Brook, and I have video documentation showing Alewife Brook flowing in reverse at the Mass Ave bridge during a storm event. As such, adding additional local storage from the Brook may actually increase the amount of floodwater retained in the area rather than forcing flow outward during earlier parts of the storm.

The disadvantage of the proposed grading is that it eliminates local pooling, which we feel is a more important benefit, by having stormwater retained in an open green space on their site, allowing the pumps at the Amelia Earhart Dam to reduce flood levels without the site contribution. By having a continuous slope to the Brook, site stormwater will continue to be added to the Brook as levels drop. As of today, ANI has not seen the impacts of the changes in the regrading on stormwater runoff, but we encourage as much local stormwater retention to assist with flooding resiliency.

Another aspect of the plans we would like the Commission and the developer to consider is using a portion of the southwest corner of Jerry's Pond for flood compensation at the upper elevation increment. This area currently has existing paving from a former development, thereby limiting vegetation in the area. Depaving would allow for better soil conditions for future habitat.

This area is largely outside of Wetlands Protection Act resource areas, including the wetlands buffer zone and Bordering Land Subject to Flooding. It is also an area less likely to be contaminated from the former industrial uses of the Development Area identified in the NOI.

Although the NOI narrative indicates Jerry's Pond is in a different subwatershed than the majority of the proposed development area, Jerry's Pond does connect to the rest of the site during the 100-year storm event, as noted by GeoInsight. The normal elevation of Jerry's Pond is below the elevation of flooding that would connect the site. By only digging out this area of higher elevation next to Jerry's Pond down to the elevation of the highest increment below the Base Flood Elevation for the site, the Pond itself would not be disturbed, so there would be no impact from disruption to sediment or other pond wildlife.

When the flood waters recede to below the elevation that connects Jerry's Pond to the rest of the site, the subwatersheds return to having their individual drainage characteristics. Above that elevation, the whole flooded area is connected as one watershed region.

Using this area for compensation would also allow more trees to be preserved in the contaminated area and result in less hazardous soil disturbance. As noted, the paved area is largely devoid of existing trees.

ANI would appreciate hearing the Commission's opinion of allowing the land near the southwest corner of Jerry's Pond for compensatory flood storage, which was given as a concern by IQHQ.

Alewife Neighbors, Inc.

Additionally, we would again request that the hearing be continued to allow the community to review and comment on revised plans.

Thank you,

Mike Nakagawa

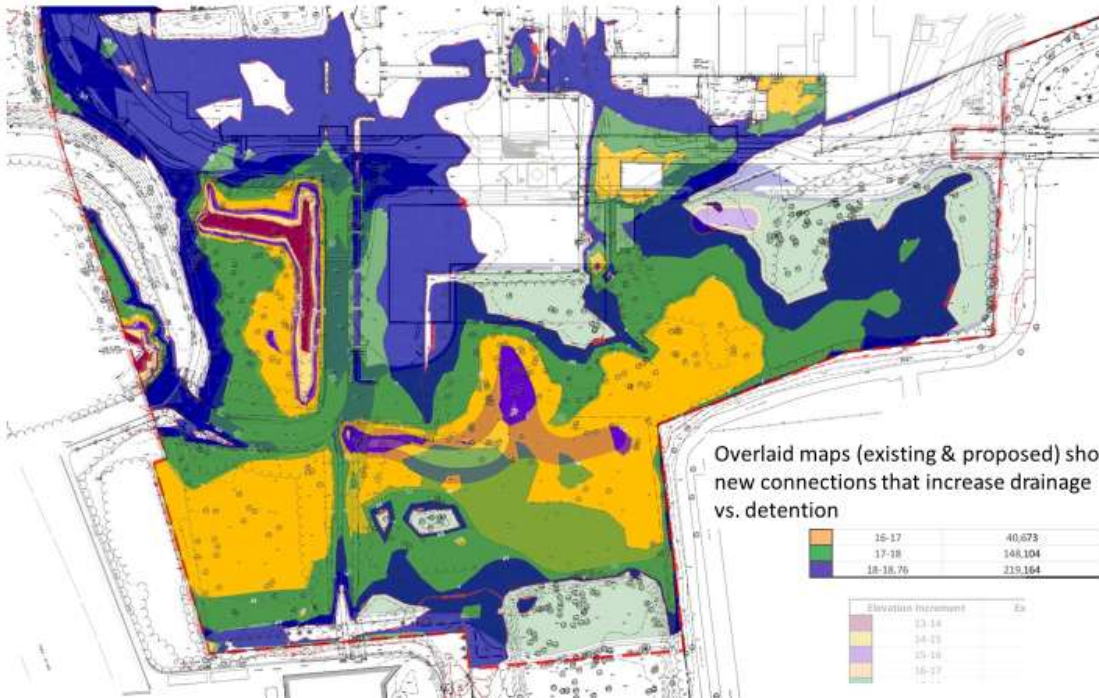
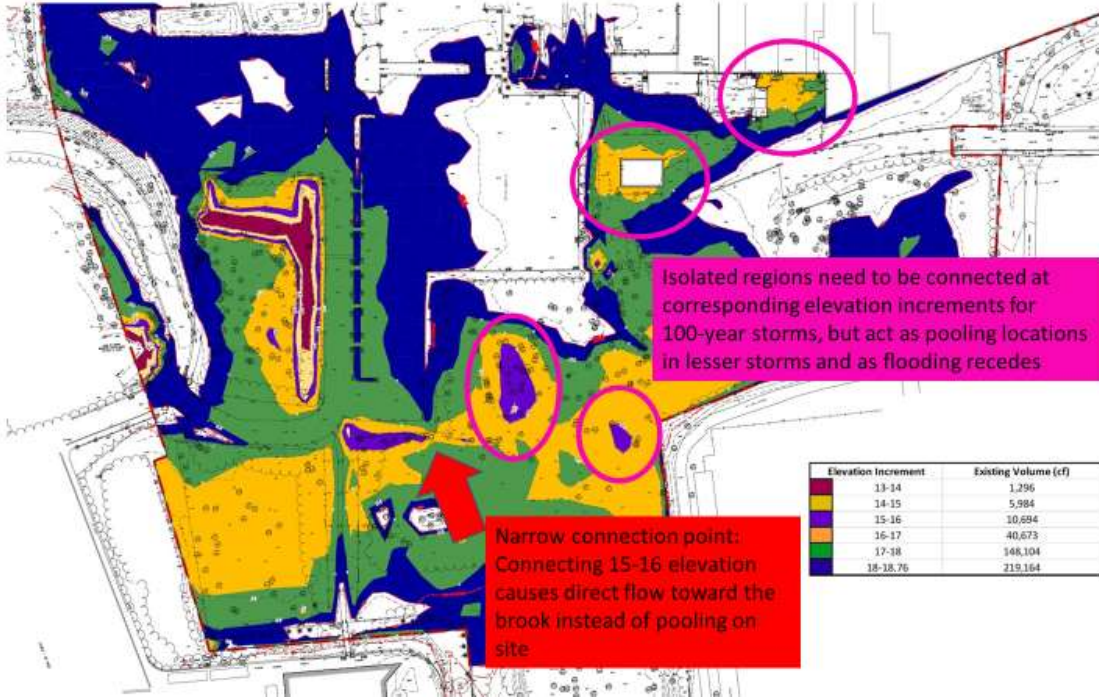
Vice President

Alewife Neighbors, Inc.

mike@alewifeneighbors.org

attachment: report by GeoInsight

Alewife Neighbors, Inc.

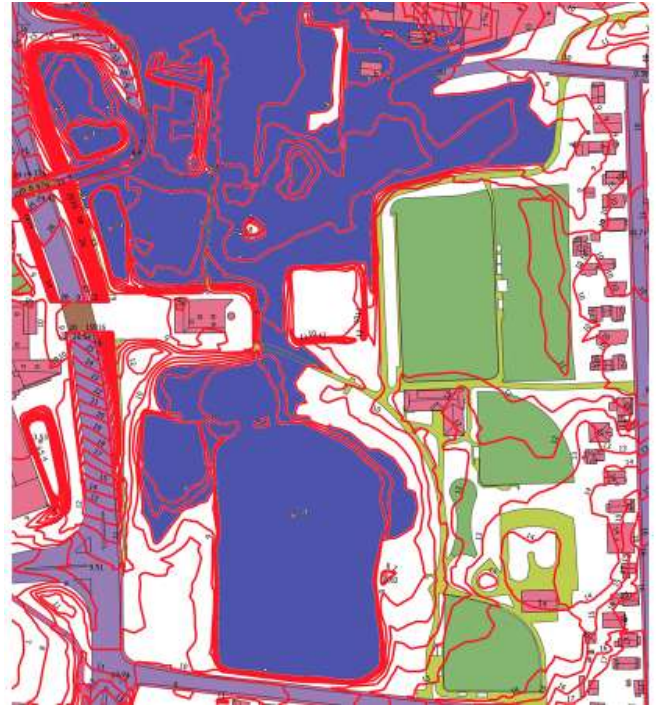


Alewife Neighbors, Inc.

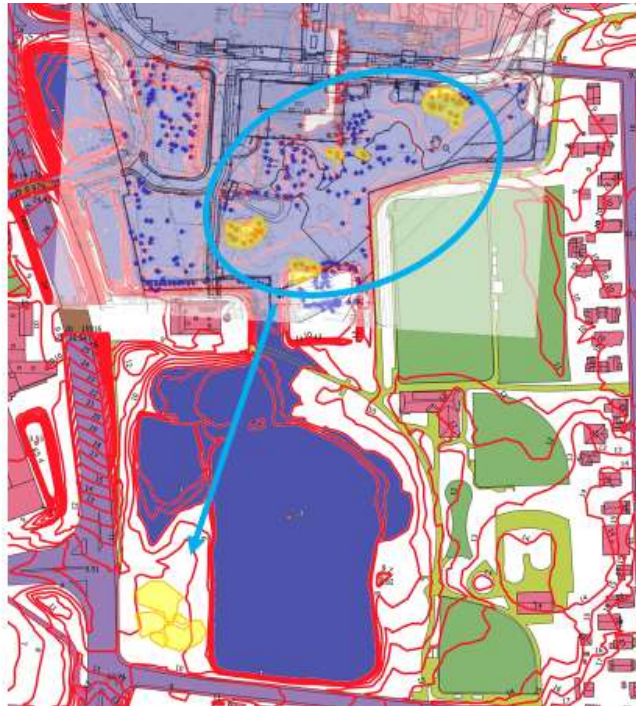
Flooding Contours from Cambridge GIS



Flooding of a 100-year storm showing connection of subwatersheds



Yellow areas show approximate extent of relocation needed near Jerry's Pond to avoid removal of clusters of trees in the contaminated area in the blue oval.





PROJECT MEMORANDUM

TO: Alewife Neighbors, Inc.
FROM: Kevin Trainer and K. James Taylor, Jr.
DATE: October 25, 2021
SUBJECT: Notice of Intent Review
Alewife Park (Former W.R. Grace & Co. Disposal Site)
Cambridge, MA

GeoInsight, Inc. (GeoInsight) prepared this memorandum to provide comments on the October 6, 2021 Notice of Intent (NOI) for IQHQ-Alewife Park located in Cambridge, Massachusetts (the Site) that was submitted by Vanasse Hangen Brustlin, Inc. (VHB) to the Cambridge Conservation Commission (ConComm) for their client IQHQ-Alewife, LLC (IQHQ). The NOI was filed pursuant to the Massachusetts Wetlands Protection Act (WPA).

Based upon our review of the submission, we have the following general observations and comments:

1. The proposed redevelopment activities are planned for the northern portion of the Site, which is identified as the Project Area in the NOI. The project proposes 353,500 additional square feet of gross floor area, an increase in flood storage, and decrease in peak runoff.
2. The Compensatory Flood Storage Plans shows a net increase in flood storage in the Project Area. Additional information should be provided to confirm the flood storage volume within Building 3E and Parking Lot North.

Stormwater Management Report

1. The stormwater management depends on the performance of green and purple roofs and pervious pavers. The performance of these components depends on their maintenance, and therefore a monitoring and maintenance plan should be prepared to ensure the effective operation of these components.
2. The pipe capacity calculations show that there are existing stormwater drainage pipes that do not have the capacity for a 25-year storm event. This information should be verified and revised, as necessary.
3. For the proposed stormwater infiltration structures, the required separation to groundwater from the bottom of the structure should be verified and provided.



4. Additional documentation and calculations are necessary to show that the stormwater management components are designed appropriately.
5. It is unclear if the project is able to meet the phosphorus removal requirements of 65%.
6. Design points C, D & E do not meet the 25 years to 2-year storm requirements, as recommended by Cambridge.
7. The area near Jerry's Pond is not included in the Project Area. However, this area could be incorporated into the stormwater management considerations for the Site (e.g., adding additional stormwater detention). We note that, based upon plans provided in the NOI, stormwater in the Project Area could naturally flow into the Jerry's Pond area during a 100-year flood event. It is recommended that additional storage volume in the vicinity of Jerry's Pond property be considered (as opposed to other locations on the subject property). This will reduce disturbance in the Project Area, which will, in turn, preserve existing trees in the Project Area and reduce potential exposure to contaminants known to be present in the Project Area.
8. The Erosion and Sedimentation Control Program does not provide details for stabilized construction entrances, Silt Sack inlet protection, Siltsocks, etc. and construction details should be provided. Potential soil stockpile locations should be identified on the plans. The report states that they will be provided but design information has not been provided. The NOI identifies that temporary sediment basins will be installed in the low points of the Project Area, but the locations of the temporary sediment basins are not shown on the plans in the NOI. The NOI plans should be modified to show the temporary sediment basins.

Landscape Plan

1. The NOI indicates "over 686 trees" in cover letter, "over "656 trees" in the Introduction section, and "a total of 686 trees" in the Planting Plan section. The actual number of trees should be clarified. The increase in the total number of trees should be quantified.
2. The plans currently proposes to remove many existing trees. It is recommended that the plan be revised to preserve as many existing trees as feasible to meet the City's Tree Protection Ordinance.
3. Documentation should be provided listing the number of trees to be removed, including the species and diameter, reason for removal, and information on the replacement trees.
4. Some of the proposed plantings are in areas where soil contamination is known to exist, or where soil contamination may be present. A September 2021 Draft Post-Closure Release Abatement Measure (RAM) Plan, which included a Non-Traditional Asbestos Abatement Work Plan (NTWP), described general soil management requirements. Based upon the information provided in the RAM Plan and the NOI, some of the plantings will be in areas



of proposed soil excavation, which will be conducted in a tented enclosure and where a protective cover (consisting of a geotextile marker barrier overlain will be clean soil or crushed stone) will be installed after excavation. However, some of the plantings will be in areas outside of the tented soil excavation areas where contaminated soil may be present. We note that, according to the March 2006 Protective Cover Monitoring Plan, the current Protective Cover at the site includes “the existing top 6 inches of surface soil, pavement and concrete slabs, pavement and concrete slab sub-base materials, structures, topsoil/loam, landscaping or the like.” Therefore, excavations for some of the proposed plantings may extend below the existing Protective Cover and into the underlying soil, which may be contaminated.

The NOI filing should provide more information about soil management practices that will be implemented during planting activities, and this information should be consistent with the soil management requirements of the RAM Plan and the NTWP Work Plan. Plantings outside of the tented enclosures may be located in areas of contaminated soil, and soil management measures should be implemented to protect the health of workers and nearby residents.

The areas of proposed soil excavation and extent of the proposed geotextile marker barrier should be identified on the planting plans in the NOI. Representative cross-sections of these plantings relative to the geotextile marker barrier should also be provided. Information on soil management for plantings outside the excavation areas should be included.