



April 27, 2021

Jennifer Steel
Chief Environmental Planner
City of Newton Conservation Commission
Attn. Wetlands Protection Act Notice of Intent
Planning and Development Department
1000 Commonwealth Avenue
Newton, MA 02459

**RE: Free Library Parking Lot Improvements
City of Newton, Massachusetts
Wetlands Protection Act Notice of Intent**

Dear Ms. Steel,

On behalf of the City of Newton Department of Public Works (City), Environmental Partners (EP) submits this Notice of Intent (NOI) for the Free Library Parking Lot Redevelopment project in accordance with the Massachusetts Wetlands Protection Act (M.G.L. Chapter 131 Section 40), the Massachusetts Wetlands Protection Regulations (310 CMR 10.00), and Newton's Floodplain Ordinance.

This NOI includes the following appendices:

- Appendix A: Massachusetts Department of Environmental Protection (MassDEP) WPA Form 3
- Appendix B: Locus Map
- Appendix C: Permitting Design Plans
- Appendix D: Wetland Delineation Report
- Appendix E: Certified Abutter's List
- Appendix F: Stormwater Report

PROJECT DESCRIPTION

The City of Newton Free Library property is located at 330 Homer Street and contains approximately 4.61 acres of developed land. The site consists of the existing parking lot, the Newton Free Library building, associated landscaping, and wetland resource areas. The existing parking lot is approximately 2.1 acres and includes 185 parking spaces.

The proposed improvements consist of redesigning the existing parking lot to include 21 additional parking spaces; 0.25 acres of porous pavement; an innovative stormwater collection system that collects, treats, and infiltrates all stormwater generated for the 1-inch storm; and removes 95% of generated stormwater phosphorus loads (compared to a current phosphorus removal rate of 0%). This project provides a significant improvement over the existing stormwater management on site

and the high rate of phosphorus removal is consistent with the City's goals for phosphorus removal as described in the Massachusetts Small Municipal Separate Storm Sewer System (MS4) Permit. The project also provides extensive landscape improvements within the existing and proposed islands as well as around the existing bordering vegetated wetlands. The redesign also accommodates the installation of solar panels above the proposed parking areas that were approved previously under a separate Order of Conditions.

PROJECT LOCATION

The Newton Free Library Parking Lot site abuts residential properties to the east across Walnut Street; "Newton Electrical" to the west; the Newton Cemetery and Arboretum to the south; and the City Hall to the north across Homer Street. An unmapped perennial stream is located to the north of the site, as noted within the Wetland Delineation Report in Appendix D. A portion of the 200-foot Riverfront Area associated with this stream extends onto the subject property; however, no proposed work occurs within this 200-foot Riverfront Area.

The proposed project is located near on-site wetland resource areas. A Bordering Vegetated Wetland is located near the front of the library building, associated with an intermittent stream. The wetland system flows south to north and through a 36" culvert under Homer Street off to the perennial stream north of the site. The limits of the proposed work are located outside of the Bordering Vegetated Wetland; however, there is proposed work within the 100-foot wetland buffer zone.

The project is not located within Estimated/Priority Habitat for Rare Species. There are also no Certified Vernal Pools located on site. The site does not contain areas mapped as Land Subject to Flooding (FEMA Flood Zones), and the site is not located within an Area of Critical Environmental Concern (ACEC).

RESOURCE AREAS

The wetland resources associated with the proposed project include Bordering Vegetated Wetlands. These areas are defined by the Wetland Protection Regulations and described further herein as they relate to the proposed project.

310 CMR 10.55 defines "Bordering Vegetated Wetlands" as "freshwater wetlands which border on creeks, rivers, streams, ponds and lakes." Portions of the project are located within the 100-foot buffer zone associated with the Bordering Vegetated Wetlands (refer to Appendix C for wetland areas).

Environmental Consulting & Restoration (ERC) flagged the wetlands at the project site on August 5, 2020. The Wetland Delineation Report is included in Appendix D. The permitting plans in Appendix C include these delineated wetlands.

Impacts to Buffer Zone

A portion of the proposed work occurs within the 100-foot buffer zone of the Bordering Vegetated Wetlands. Proposed work within this area includes, but is not limited to: demolition of various

existing site features such as curbing, pavement, drainage structures, and sidewalks; proposed pavement, landscaping, drainage structures; proposed drainage infiltration infrastructure and porous pavement; and proposed erosion controls. All proposed work is located within previously disturbed areas.

EP does not anticipate any permanent impacts to wetland resource areas. Additionally, the construction activities associated with the project do not alter any wetlands. All project construction and underground utility work occurs on City-owned property.

Proposed Environmental Protection Measures

The project includes the following environmental protection measures in order to mitigate impacts to wetland resource areas during construction activities.

- Erosion and sedimentation control devices (i.e. filter sock) are proposed around wetland area as shown on the design sheets and per the detail. These devices will control sedimentation and erosion from the upland areas. The Contractor shall inspect the erosion and sedimentation control devices daily during the construction period.
- A stabilized construction entrance is proposed at the access driveway to the Free Library Parking Lot, as shown on the design sheets and per the detail. The construction entrance prevents sediment from construction vehicles from leaving the project site.
- The contractor shall store stockpiles of aggregate materials (gravel, sand, and stone) in upland areas, outside of any protected resource area buffer zones, with proper sedimentation controls to prevent the erosion of stockpiled materials entering nearby wetlands.
- During construction, the Contractor shall keep disturbed areas near the wetlands to a minimum, and all disturbed areas adjacent to the work shall be stabilized and restored to their pre-construction condition with pavement, gravel, or loam and seed following construction.
- The project implements Low Impact Development (LID) Stormwater Best Management practices in accordance with the Massachusetts Stormwater Standards.

STORMWATER MANAGEMENT

This NOI submission includes a Stormwater Report (Appendix F); and the design and construction of the proposed stormwater management systems for the Free Library Parking Lot are in accordance with and exceed the Massachusetts Stormwater Standards. The existing parking lot stormwater management system was constructed prior to the promulgation of the Massachusetts Stormwater Standards and does not meet the performance standards described in the Standards. The proposed project requires site clearing and results in the loss of 0.25 acres of landscaped area; however, this is offset by 0.25 acres of proposed pervious asphalt. This pervious asphalt, in addition to the proposed high performing stormwater infiltration system; significantly improves upon existing stormwater management on site. The proposed stormwater management systems provide groundwater recharge, attenuate peak discharges, and provide total suspended solids (TSS) removal that exceeds the Massachusetts Stormwater Standards.

PUBLIC NOTIFICATION

A copy of the Certified Abutter's list is included as Appendix E. We understand the Newton Conservation Commission also provides notification through the local newspaper.

SUMMARY

This project proposes the redevelopment and improvement of the City of Newton Free Library Parking Lot. The proposed work is located outside of Wetland Resource Areas under the jurisdiction of the Wetlands Protection Act; however, there is proposed work within the 100-foot wetland buffer zone. The proposed project has been designed in accordance with the Wetlands Protection Act. Erosion control measures have been implemented into the design to mitigate disturbances from construction practices. Accordingly, no adverse effects to the resource area and surrounding areas are anticipated as a result of the proposed project. The project will improve water quality discharges from the parking lot and result in significant reductions in sediment and phosphorus loads to wetlands systems in this area.

If you have any questions or need any additional information, please do not hesitate to contact me at 617-657-0280 or by email at sdt@envpartners.com.

Sincerely,



Environmental Partners Group, Inc.
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Appendices:

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