

JANUARY 2, 2025

Town of Arlington Conservation Commission  
c/o Mr. David Morgan, Environmental Planner + Conservation Agent  
Robbins Memorial Town Hall  
730 Massachusetts Avenue  
Arlington, Massachusetts 02476

**RE: Restoration Plan and Invasive Species Management Plan  
Thorndike Place Residential Development**

Dear Members of the Arlington Conservation Commission,

At the previous public hearing on the Project, a Commission member did not recall concluding discussions on the Restoration Plan and Invasive Species Management Plan (ISMP) for the above referenced project. As such, we are providing the following, attached information:

1. A letter to the Commission from Mr. P. Chase Bernier, CWB, PWS, CERP, of SWCA Environmental Consultants (SWCA), dated March 27, 2024, *Re: Notice of Intent Restoration Plan Peer Review – Review of Response to Comments, Thorndike Place, Arlington, Massachusetts*. In this letter, SWCA, as peer review consultant for the Commission, confirms adequate response to all except one of their previous review comments. This letter was submitted by SWCA to the Commission in March 2024.
2. A letter to the Commission from Mr. Matt Burne, PWS, Senior Ecologist at BSC Group (BSC), dated April 4, 2024, *RE: Notice of Intent, SWCA Notice of Intent Restoration Plan Peer Review, Thorndike Place Residential Community, Dorothy Road, Arlington, MA*. In this letter, previously submitted to the Commission, BSC details our response to the lone outstanding comment from SWCA's March 27, 2024, letter.
3. The meeting minutes from the Conservation Commission's April 4, 2024, public meeting on the Project Thorndike Place minutes begin on page 9). We have highlighted two portions of this discussion for reference. On page 11, there is a notation of Chase Bernier of SWCA concurring that Japanese knotweed requires herbicide to treat effectively. On page 12, there is a notation that "The Commission has completed the portion of the hearing dealing with the habitat and invasive management portion of the application, and going forward, will focus on the stormwater portion."

We believe that these documents clearly demonstrate that the peer review on the restoration and ISMP portion of the project is complete and that the Commission has completed discussion on this matter.

Sincerely,  
BSC GROUP, INC.



**Dominic Rinaldi, PE**  
Senior Associate

Attachments: March 27, 2024, SWCA Review Letter  
April 4, 2024, BSC Response to Review  
April 4, 2024, Conservation Commission Meeting Minutes



ENVIRONMENTAL CONSULTANTS

Sound Science. Creative Solutions.®

1900 West Park Drive, Suite 280  
Westborough, Massachusetts 01581  
Tel 413.256.0202  
www.swca.com

March 27, 2024

Ryan Clapp  
Arlington Conservation Commission  
730 Massachusetts Avenue Annex  
Arlington, MA 02476

**Re: Notice of Intent Restoration Plan Peer Review – Review of Response to Comments  
Thorndike Place, Arlington, Massachusetts**

Dear Mr. Clapp and Members of the Commission:

SWCA Environmental Consultants (SWCA) submitted a peer review letter report dated January 23, 2024 for a proposed restoration plan as part of the proposed Thorndike Place Residential Community Notice of Intent (NOI). In response to that report, BSC Group, Inc. (BSC), submitted a response to comments letter dated February 7, 2024, including revised plan materials. SWCA completed a review of those responses revised NOI documents on March 6, 2024. BSC submitted additional revised materials for review on March 7, 2024 (Invasive Species Management Plan [ISMP]) and March 12, 2024 (Response to Comments response and revised restoration plans). This correspondence represents SWCA's review of those revised materials.

## **PROJECT NARRATIVE**

### **Project Activities & Associated Impacts**

SWCA Comment 1: Section 3.1.1, second paragraph. The narrative states that dead trees (i.e., snags) that do not provide wildlife habitat will be cut and stumped. Snags provide a wide variety of valuable wildlife habitat functions including shelter and forage opportunities. It is doubtful there are any snags that do not provide any wildlife habitat functions. Additionally, removal of snags does not appear to provide any ecological benefit and stumping of snags within the restoration area would likely result in unnecessary additional impacts (e.g., soil disturbance).

SWCA recommends that this language be revised to indicate that only snags that pose a hazard (e.g., leaning towards the proposed buildings and likely to result in property damage or injury) be removed and that no stumping will occur. SWCA recommends the Commission also consider a condition in the Order of Conditions (OOC), if issued, stating that any snags to be removed shall be approved by the Commission.

BSC Response 1: BSC concurs with the recommended revision and suggests a Special Condition allowing removal of snags from the proposed restoration area that pose a hazard (e.g., leaning toward buildings and/or likely to result in property damage or personal injury) and that no stumping of removed snags shall be permitted. We additionally recommend that the Special Condition allow for a

representative of the Commission be authorized to coordinate, review, and approve any snag removal on behalf of the Commission to avoid construction delays.

**SWCA Response 1: SWCA agrees with this response and approach. No further response required.**

SWCA Comment 2: Section 3.1.1, second paragraph. The narrative states that an Invasive Species Management Plan (ISMP) for work within resource areas and their buffer zones shall be developed as required by the Comprehensive Permit. During the site walk on January 5, representatives from BSC indicated that invasive species control would be included as part of the proposed restoration efforts. It is unclear how invasive species would be controlled (e.g., mechanical removal, chemical control, etc.) or what the target species would be.

SWCA recommends the Applicant develop a detailed ISMP to be included as part of the NOI that details what the target invasive species will be, proposed specific control methodologies, a monitoring plan to measure invasive vegetation control success, and performance goals. SWCA recommends the ISMP be reviewed by an expert in invasive species removal as some species (e.g., Japanese knotweed [*Reynoutria japonica*]) can be extremely challenging to effectively control.

BSC Response 2: Several invasive plant species occur on the site, most notably Japanese knotweed, oriental bittersweet (*Celastrus orbiculatus*), and garlic mustard (*Alliaria petiolata*). These occur within jurisdictional resource areas and buffer zones, as well as within non-jurisdictional areas of the site.

BSC and the Applicant will prepare an Invasive Species Management Plan (ISMP) to treat invasive plants currently within the proposed wetland restoration area and to control their spread within the restoration area. BSC recommends that approval of such ISMP by the Commission's representative prior to the start of work be made a Special Condition of an OOC for the project.

SWCA Response 2-1: SWCA recommends that the ISMP be submitted to the Commission and reviewed by an expert in the control of invasive species prior to the issuance of an OOC. Effective control of invasive plants is critical to the success of any ISMP and may require complex management methodologies given the extent and diversity of invasive species on the site. Review of the ISMP prior to OOC issuance ensures the ISMP will be effective and that the Commission has the ability to guarantee that the plan is adequate prior to permit issuance.

BSC Response 2-1: BSC submitted a proposed ISMP for peer review on March 7, 2024.

SWCA Response 2-2: *In SWCA's experience, the most effective way to manage sites similar to the proposed project is to utilize an adaptive management approach. The mechanical, manual, and chemical options appear to be presented as if only one can be chosen for each species. For example, common reed (*Phragmites australis*) and Japanese knotweed, benefit from a combined approach (e.g., cutting first at the appropriate time and then treating with herbicide at the appropriate time. There also appears to be consistent issue throughout the ISMP of misrepresenting the proposed concentrations of herbicide and not mentioning that the chose herbicide label must be followed.*

*SWCA recommends the ISMP be adaptive and that sticking to a strict pre-set and unchangeable schedule from year to year is not in the best interest of achieving effective invasive management. However, the first year's schedule should be specifically laid out. Depending on when construction is expected to commence (e.g., clearing, grading, etc.) the method of moving forward with treating invasive vegetation may need to be revised. If the exact start date of construction is unknown, the ISMP should be reframed that stresses the qualified invasive applicator/specialist can decide what treatment method and*

timing should be utilized based on site conditions. SWCA also recommends the Applicant either check the label and edit the percentages of herbicide or revise the ISMP to specify that the label rates will be followed.

**SWCA Comment 3:** Section 3.1.1. The narrative includes multiple references to refuse that has been dumped on the site over the years. During the site walk on January 5, it was noted that as part of the proposed restoration work, the refuse would be removed as much as practicable.

SWCA recommends the Commission include a condition in the OOC, if issued, that requires all surficial refuse, including discarded clothing, metal, concrete rubble, lumber, plastic, and other similar garbage, to be removed from within the resource areas and their associated buffer zones within the limit of work. SWCA also recommends the Commission indicate that any refuse at the surface and partially buried be removed to a depth of up to 12 inches below ground (e.g., a shopping cart that has become partially buried in the soil).

**BSC Response 3:** BSC concurs with SWCA Comment 3 and agrees such a Condition be included as part of the OOC.

**SWCA Response 3: No further response required.**

**SWCA Comment 4:** Section 3.1.1. The narrative provides a brief discussion of the proposed restoration activities, specifically restoration plantings. However, successful habitat restorations consider a wide variety of considerations, beyond vegetation. More specifically, the wildlife habitat and vegetation evaluation provided in Attachment G of the NOI identifies numerous wildlife habitat features including large woody debris, snags, hard mast and berry producing forage, rocks and rock piles, and others.

SWCA recommends the restoration plan consider how to improve important wildlife habitat functions within the restoration area and include methods to provide important wildlife habitat features that may be lost due to proposed impacts elsewhere on site.

**BSC Response 4:** The Restoration Plan has been updated to include proposed placement of coarse woody debris and stones and a few stone piles using natural materials originating from within the limit of work on the project site. The Restoration Plan maximizes the use of native berry and mast producing vegetation to benefit wildlife habitat values of the restoration area. See Appendix for details of wildlife habitat features.

**SWCA Response 4: SWCA concurs with these revisions. No further response required.**

**SWCA Comment 5:** Section 3.1.1. The narrative and the wildlife habitat and vegetation evaluation identify numerous native and non-native trees and shrubs within the project limit of work, including the restoration area. However, out of the 17 proposed trees and shrubs to be planted, only two (red maple [*Acer rubrum*] and American hornbeam [*Carpinus carolineana*]) are included on the plant schedule.

SWCA recommends the restoration plan be revised to include species within the restoration area that occur on-site to better represent the diversity and community structure of adjacent habitats. There are numerous trees and shrubs documented in the NOI application materials that would be suitable for the restoration area including American elm (*Ulmus americana*), black cherry (*Prunus serotina*), yellow birch (*Betula allegheniensis*), sweet birch (*Betula lenta*), box elder (*Acer negundo*), silver maple (*Acer saccharinum*), white pine (*Pinus strobus*), sycamore (*Platanus occidentalis*), black willow (*Salix nigra*), and others that are also typically readily available as nursery stock.

**BSC Response 5:** BSC concurs with SWCA Comment 5 and has updated the proposed planting plan and shown approximate locations of wildlife habitats.

**SWCA Response 5-1:** The proposed planting plan still includes multiple species that are not representative of the of the diversity and community structure of the adjacent habitats (e.g., Atlantic white cypress [*Chamaecyparis thyoides*] and others). SWCA recommends the planting plan be revised to includes species that better represent the adjacent communities within the restoration area.

**BSC Response 5-1:** Please refer to Sheet L-100. No tree is proposed within the restoration area or compensatory flood storage area that is not specifically listed in SWCA Comment 5. BSC is providing a color-markup of the restoration planting sheet to clarify proposed species placements.

It should be noted that the planting plan is for the entire project site, including areas outside of the Commission’s jurisdiction.

The proposed woodland and floodplain restoration seed mixes are as follows:

| Botanical Name                      | Common Name             |
|-------------------------------------|-------------------------|
| <i>Asclepias syriaca</i>            | Common milkweed         |
| <i>Asclepias incarnata</i>          | Swamp butterfly weed    |
| <i>Symphyotrichum novae-angliae</i> | New England aster       |
| <i>Chamaecrista fasciculata</i>     | Partridge pea           |
| <i>Elymus canadensis</i>            | Canada wild rye         |
| <i>Elymus virginicus</i>            | Virginia wild rye       |
| <i>Festuca rubra</i>                | Red fescue              |
| <i>Redbeckia laciniata</i>          | Green-headed coneflower |
| <i>Schizachyrium scoparium</i>      | Little bluestem         |
| <i>Solidago juncea</i>              | Early goldenrod         |
| <i>Sorghastrum nutans</i>           | Indian grass            |
| <i>Symphyotrichum novi-belgii</i>   | New York aster          |
| <i>Baptisia tinctoria</i>           | Horseflyweed            |
| <i>Desmodium canadense</i>          | Show tick-trefoil       |
| <i>Euthamia graminifolia</i>        | Flat-top goldenrod      |
| <i>Pycnanthemum virginianum</i>     | Virginia mountain mint  |

**SWCA Response 5-2:** SWCA concurs with these revisions. No further response required.

## SITE PLANS

**SWCA Comment 6:** Sheet G-101, Planting Notes, Note 11. The site plans indicate that the plant species indicated on the plant list are recommendations only and that final selection of the species shall occur at the time of plant purchase, depending on availability and that the size and quantity shall not change without approval of the Applicant’s landscape architect.

SWCA recommends this note be revised to indicate that the proposed planting species, sizes, and quantities may be subject to change based on availability. However, these changes should be approved by the Conservation Commission and should be approved prior to purchase.

**BSC Response 6:** BSC has made the recommended revision to the Sheet G-101 Planting Notes, Note 11. We recommend that the OCC allow administrative approval of such availability-based changes by the Conservation Commission or its authorized representative to prevent undue construction delays in making such substitutions if necessary.

**SWCA Response 6: SWCA agrees with these revisions. No further response required.**

**SWCA Comment 7:** Sheet G-101, Comprehensive Permit Notes, Comment I.5. This comment notes that dumping of woody vegetation, brush, and other debris in a resource area or its associated buffer zone is prohibited.

SWCA notes that an exception to this requirement might be considered for the restoration area as large woody debris, brush piles, and other similar wildlife habitat features provide quality habitat functions and are likely to increase the ecological value of the restored habitats.

**BSC Response 7:** Sheet G-101, Comprehensive Permit Notes, Comment 1.5 is a Condition of the Comprehensive Permit, and the wording is copied directly from that Condition. The intent of the Condition is to prohibit the dumping of materials removed during construction in the wetlands or buffer zone. In accordance with BSC Response 4 above, the Restoration Plan will be updated with detailed natural coarse woody debris and stone wildlife habitat features using materials originating from the site, but material removed from the site during construction will not be disposed of within resource areas or associated buffer zones in accordance with the Comprehensive Permit condition.

**SWCA Response 7: SWCA agrees with this approach. No further response required.**

**SWCA Comment 8:** Sheet G-101, Comprehensive Permit Notes, Comment I.25. The site plans note that the survival rate of planted species shall be 80% at the end of the third year and that a corrective action plan must be submitted if the survival rate is less than 80% at the end of the third year.

SWCA recommends the Commission consider requiring a corrective action plan to be developed by the Applicant if the 80% success rate is not met after any year of monitoring. Waiting until the third year of monitoring to develop and implement any corrective actions may unnecessarily prolong reaching the project's performance goals and may result in unnecessary disturbance to the area to rectify any adverse conditions since the restoration area will have had three years to establish.

**BSC Response 8:** Sheet G-101, Comprehensive Permit Notes, Comment I.25 is a condition of the Comprehensive Permit, and the wording is copied directly from that Condition. The Comprehensive Permit Condition was prepared upon the recommended conditions submitted to the Zoning Board by the Conservation Commission by letter dated October 14, 2021.

**SWCA Response 8: No further response required.**

**SWCA Comment 9:** Sheet L-100, Plant Schedule. The plant schedule includes a number of proposed cultivars within the 100-foot Buffer Zone (e.g., *Clethra alnifolia* 'ruby spice', *Hydrangea quercifolia* 'ruby slippers', and *Hydrangea arborescens* 'annabelle'). In accordance with condition I.24 of the Comprehensive Permit, all mitigation plantings and plantings within all resource areas shall be native, non-cultivar species. Additionally, other cultivars are proposed in other areas of the site along side non cultivars of native species (e.g., pin oak [*Quercus palustris*] and green pillar pin oak [*Q. palustris* 'pringreen'])).

SWCA recommends the planting plan be revised to not include any cultivars.

BSC Response 9: BSC concurs with SWCA Comment 9 and has revised the planting plan to not include cultivars within the 100-foot buffer.

SWCA Response 9-1: The revised planting plan continues to propose a number of cultivars within the 100-foot Buffer Zone. Other cultivars are still proposed in other areas of the site.

SWCA recommends the planting plan be revised to not include any cultivars. SWCA also encourages the Applicant to utilize non-cultivars of native species throughout the site.

BSC Response 9-1: BSC has revised the proposed restoration planting plan to remove cultivars and has revised the proposed seed mixes for the restoration and compensatory flood storage areas to contain only native plants. The lawn seed mix has also been revised to contain only native species.

It should be noted that the planting plan is for the entire project site, including areas outside of the Commission's jurisdiction. There is one plant proposed that is a non-native landscaping plant, but it is proposed to be located along the walking path between the buildings, outside of the Commission's jurisdiction.

**SWCA Response 9-2: SWCA concurs with these revisions. No further response required.**

SWCA Comment 10: Sheet L-100. A note on the plans indicates that all dead trees (i.e., snags) that do not provide wildlife habitat per the landscape architect and wildlife ecologist should be removed. Snags provide a wide variety of valuable habitat functions for wildlife including forage for insects, perches to hunt from, shelter if there are cavities or cracks, and other functions.

SWCA recommends this note be revised to indicate that only snags that pose a hazard (e.g., may fall and land on the buildings) may be removed and that removal of any snags must be approved by the Commission.

BSC Response 10: BSC concurs with SWCA Comment 10 and has revised Sheet L-100 according to SWCA's Comments 1 and 10.

SWCA Response 10-1: This note does not appear to indicate that removal of any snags must be approved by the Commission.

SWCA recommends revising this note as to indicate that Commission approval is required for snag removal.

BSC Response 10-1: The note on Sheets L-100 has been updated to state, "2. Remove all invasive species according to ISMP; cut and remove (do not stump) all dead trees that pose a safety hazard to people or property as determined by Landscape Architect (LA) & Wildlife Ecologist (WE) with administrative approval of Conservation Commission; restore areas with native tree, shrub, and grass plantings as directed by LA. Utilize cut plant materials to construct snags and wildlife habitats as directed by LA & WE.

**SWCA Response 10-2: SWCA concurs with these revisions. No further response required.**



If you have any questions or comments, please do not hesitate to contact me at either (508) 232-6668 or [chase.bernier@swca.com](mailto:chase.bernier@swca.com).

Sincerely,



P. Chase Bernier, CWB, PWS, CERP  
Senior Natural Resources Team Lead

---

---

APRIL 4, 2024

Arlington Conservation Commission  
730 Mass Ave Annex  
Arlington, MA 02476

**RE: Notice of Intent  
SWCA Notice of Intent Restoration Plan Peer Review  
Thorndike Place Residential Community  
Dorothy Road, Arlington, MA**

Dear Members of the Arlington Conservation Commission:

On behalf of Arlington Land Realty, LLC (the Applicant), BSC Group, Inc. respectfully presents the following response to SWCA's peer review report dated March 27, 2024. The March 27 letter provides closure on nine (9) out of the ten original comments, finding that there is "no further response required" to Comments 1 and 3 – 10. SWCA Comment 2 pertains to the ISMP required under the Comprehensive Permit for this project which was submitted to the Commission and to SWCA for review on March 7, 2024.

**From the March 27, 2024 SWCA Peer Review letter:**

*SWCA Response 2-2: In SWCA's experience, the most effective way to manage sites similar to the proposed project is to utilize an adaptive management approach. The mechanical, manual, and chemical options appear to be presented as if only one can be chosen for each species. For example, common reed (*Phragmites australis*) and Japanese knotweed, benefit from a combined approach (e.g., cutting first at the appropriate time and then treating with herbicide at the appropriate time. There also appears to be consistent issue throughout the ISMP of misrepresenting the proposed concentrations of herbicide and not mentioning that the chose herbicide label must be followed.*

*SWCA recommends the ISMP be adaptative and that sticking to a strict pre-set and unchangeable schedule from year to year is not in the best interest of achieving effective invasive management. However, the first year's schedule should be specifically laid out. Depending on when construction is expected to commence (e.g., clearing, grading, etc.) the method of moving forward with treating invasive vegetation may need to be revised. If the exact start date of construction is unknown, the ISMP should be reframed that stresses the qualified invasive applicator/specialist can decide what treatment method and timing should be utilized based on site conditions. SWCA also recommends the Applicant either check the label and edit the percentages of herbicide or revise the ISMP to specify that the label rates will be followed.*

**BSC Response 2-2-1:**

BSC is recommending an Invasive Species Management Plan that relies on the best management practices (BMP) and professional judgment of a Senior Botanist with many years of successful invasive plant management experience. An adaptive strategy that combines both mechanical and chemical approaches to maximize control of invasives while minimizing unintended impacts is presented (ISMP, page 9). It is our intent to utilize mechanical control methods to the extent practical and minimize the duration and intensity of any chemical controls employed.

The management techniques chosen for this project are specific to this location based on the species found there, proposed future activities, and specific site conditions. The proposed invasive plant species management techniques are the BMPs for this location. For example, while common reed isn't presently within the treatment area, it was included as a potential future species due to its current presence in proximity to the treatment area. Including this species as a potential future invasive species was intended as a dimension of our adaptive management approach.

BSC disagrees with the reviewer's suggestion that pre-cutting Japanese knotweed and/or Phragmites is the best approach based on the potential timing of this project and the specific reproductive biology of this plant. It is well established that both Japanese knotweed and Phragmites spread via cuttings of the stems and rhizomes. Severing plants before chemical treatment will counterproductively spur additional growth and reduce the effectiveness of chemical treatments. In our Senior Botanist's experience, plants that have been chemically treated after being cut in the same season have a decreased probability of successful eradication and instead require increased subsequent chemical use for successful treatment – which we seek to avoid.

The Invasive Species Management Plan developed for Thorndike Place is intended to be an adaptive management plan. The timetables reflect an ability to initiate the ISMP at any time of year depending on a construction schedule that will be determined in the future. We prescribe specific treatment times depending on the specific requirements of the species on the site, i.e. knotweed must be treated after flowering during September and cut-stump treatments should only be performed between July 1 and December. The purpose of the proposed treatment timetable is to allow initiation of treatment at any point in the year, with proper treatment recommendations that fall sequentially into place after the ISMP initiation.

In all cases, the intent of our adaptive approach is to use both mechanical and chemical approaches as appropriate with the overall goal of maximizing successful eradication of invasives utilizing chemical controls in the lowest concentration consistent with best management practices.

It should go without saying that any herbicide applicator will be fully licensed and trained and required to follow the law (i.e.: the label) when applying herbicide. The submitted ISMP does not recommend any deviation from product labels for any specific herbicide and is consistent with standard best management practice for their use.

We look forward to an opportunity to discuss these revisions with the Commission and its Peer Review consultant at the upcoming hearing. Mr. Groves will again be available to discuss the ISMP and is also available to answer questions that may come up during the hearing.

If you have any questions regarding the enclosed information, please contact me at (617) 896-4594 or [mburne@bscgroup.com](mailto:mburne@bscgroup.com). Thank you for your consideration in this matter.

Thank you,  
BSC Group, Inc.



Matt Burne, PWS  
Senior Ecologist

cc: Stephanie Kiefer



## Arlington Conservation Commission

Date: April 4, 2024

Time: 7:00 PM

Pursuant to State Legislation suspending certain provisions of the Open Meeting Law, G. L. c. 30A, § 20 the meeting was held virtually using Zoom.

### Attendance [0:06:45]

|                       |                           |                   |
|-----------------------|---------------------------|-------------------|
| <b>Commissioners:</b> | Susan Chapnick (Chair)    | Brian McBride     |
|                       | Chuck Tirone (Vice Chair) | Nathaniel Stevens |
|                       | Mike Gildesgame           | David White       |
|                       | David Kaplan              |                   |

**Conservation Agent:** David Morgan

**Associate Commissioners:** Eileen Coleman                      Sara Alfaro-Franco

### Agenda

#### I. Administrative

##### 1. Review Meeting Minutes.

- N. Stevens made a motion to approve the minutes of 3/7/2024 as amended. M. Gildesgame seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |
| D. White – yes  |                   |                     |

Motion passed.

##### 2. Correspondence Received.

- The Chair noted that all correspondence received is available for the public to review by contacting D. Morgan.

#### II. Discussion [0:14:56]

##### 1. Water Bodies Working Group.

- D. White said that the Working Group requested \$120,000 for FY2025. The Finance Committee approved \$85,000.
- N. Stevens made a motion to appoint E. Coleman to the Water Bodies Working Group. B. McBride seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |
| D. White – yes  |                   |                     |

Motion passed.



- The next meeting of the Working Group is next Thursday at 6:00 pm. D. White will send out an agenda.
  - D. White noted that a new aerator for Hill's Pond will be purchased.
2. Tree Committee Update.
- S. Alfaro-Franco said that the Tree Committee plans to plant 150 trees this spring season. They are a month and a half ahead of schedule because of the weather.
3. Artificial Turf Study Committee Update.
- The next meeting, which will probably be the final meeting, will be Tuesday, April 9, 2024. The Study Committee is concluding its work. They have issued a draft report and posted it on their web page. That report will soon be finalized.
4. Arlington High School Permit Extension (DEP #091-0323). [0:19:58]
- The team members introduced themselves:
    - Jeff Thielman, Arlington High School (AHS) Building Committee Chair
    - Kirsi Allison-Ampe, School Committee Chair, AHS Building Committee Member
    - Jim Feeney, Town Manager
    - Liz Homan, School Superintendent
    - John Amato, JJA Sports, Sports Field Designer
    - Steve Garvin, Civil Engineer, Samiotes Consultants
    - Laurie Coles, HMFH Architects
    - Arthur Duffy, HMFH Architects
    - Jim Burrows, Skanska, OPM
    - Matthew Janger, AHS Principal
  - J. Thielman said that the AHS Building Committee is requesting an extension of the Order of Conditions granted by the Commission in 2020 for the synthetic turf fields for the new Arlington High School. During early community discussions and the 2019 voter approval of the project, synthetic turf fields have always been proposed. To remain on schedule and on budget, the infill for the synthetic fields must be ordered by June 30, 2024, less than 90 days from this meeting.
  - In the summer of 2020, the Conservation Commission reviewed plans for the turf fields and concluded that the fields as designed did not have a significant or cumulative effect on the wetland values protected by the bylaw, and the Commission granted an Order of Conditions. In 2021, the Town signed seven contracts for work to be performed on the fields; by 2023, some of the systems supporting the fields were built. In July 2023, the AHS Building Committee applied for an extension of the 2020 Order of Conditions. During the meeting, the Commission was told about new information pertaining to 6PPD and 6PPD-quinone. When this information was given to the Building Committee in August 2023, the Committee agreed to evaluate the costs, risks, and benefits of crumb rubber and alternative infills and study the applicability of the research to the specific conditions at AHS. The Commission granted a one-year extension to the 2020 Order of Conditions.



- L. Homan noted that any changes made to the design at this late stage in the project are likely to significantly impact the budget and schedule. The Building Committee initially chose turf fields because they provide a better performance environment and have manageable maintenance, and the environmental impact can be mitigated through the design. Alternatives to crumb rubber create additional costs and have significant drawbacks, including negative impacts to safety and athletic performance. There is also less data on the alternatives. Crumb rubber infill is the best option currently; it has proven data, and many installations have successfully mitigated the environmental impact. It has superior athletic performance, longevity, and safety conditions, as well as lower cost.
- K. Allison-Ampe said that in August 2023, the Commission raised concerns about toxicity of 6PPD-quinone for fish in Mill Brook. The Building Committee and its consultants have reviewed multiple studies and concluded that the conditions needed to create 6PPD-quinone are not present in the AHS field design. 6PPD is used in rubber tires. The combination of smog and volatile organic compounds plus UV light from sunlight acts on 6PPD to form 6PPD-quinone, which occurs in tiny particles called tire abrade which can be washed off roadways and into ecosystems where they are toxic to fish. Biofilters composed of leaf mold sand and crushed stone have been found to protect fish. Tire abrade particles range from 1 to 1,000 microns; rubber infill particles range from 1,000 to 2360 microns. The compositions of tire abrade and rubber infill are also quite different; rubber infill includes no metals and meets Standard Consumer Safety Specification for Toy Safety. The AHS field drainage plan includes extensive filtration, including the possible inclusion of additional baskets, so that only clean water will drain into Mill Brook.
- J. Feeney said that the AHS Building project is funded by 2019 debt exclusion vote, combining funding from Arlington taxpayers and the state. At the beginning of the project, the Town entered into a project funding agreement with the Massachusetts School Building Authority (MSBA), and the Town is required to stay within that budget. If the Town wishes to add more funds, the MSBA has sole discretion to determine if additional funding is eligible. If the funding is ineligible, it would proportionally decrease the Town's maximum total facilities grant portion, so the Town could lose project reimbursement funds. To date, the total committed costs of the turf fields is just over \$1,200,000. Any material changes in the plans for the fields will cause the locked-in subcontract values to increase. If a contract were to be cancelled, a subcontractor to bring a claim against the Town for lost revenue. In August 2023, the Commission asked if the Building Committee could use contingency funds for an alternative infill. The Committee did consider that, but they do not believe that there are enough contingency funds. Contingency funds have been used for several unforeseen costs already, and the project is entering a phase of construction with significantly higher risks. Even if sufficient contingency funds were available, the Committee, the school district's leadership, and the project design team did not believe that it was in the best interest of the students and the community to purchase an alternative infill.
- J. Thielman said that the Building Committee has reviewed all the available information and recently voted unanimously to reaffirm their decision to use crumb rubber infill. They request an extension of the Order of Conditions.
- C. Tirone clarified that this is not a hearing and will not result in a vote. The hearing will be held at the Commission's next meeting.



- N. Stevens said that he would like to know more about how the proposed basket filtration works and how it would be maintained, as well as whether contingency funds could be used to pay for it. J. Thielman said that it would be an additional cost of \$15,000 to \$18,000. A. Duffy said that there are 18 trench drain basins, which have sump pumps. The manufacturer also offers the option of screen baskets that can capture larger particulars of crumb rubber, leaves, pine needles, etc. The maintenance plan would be to open up the hatches and empty the baskets a few times a year. N. Stevens said that he would like to see a cut screen of the basket. He also said that an extension would not allow for any changes, so including the baskets might require an amendment to the Order of Conditions.
- B. McBride asked how confident the Building Committee is that 6PPD-quinone will not develop under the conditions of the turf fields, and if they would be willing to accept a monitoring condition to determine whether it does develop. K. Allison-Ampe said that an approved test for 6PPD-quinone in water does not currently exist. When such a test becomes available, they would be willing to consider it.
- M. Gildesgame said that in his experience of the turf field at Arlington Catholic, the crumb rubber is everywhere, both above and below the grass, so he is not confident that it would be shaded by the grass and therefore not exposed to the environment. Such exposure would make it more likely that 6PPD-quinone would develop. K. Allison-Ampe said that she does not know the exact conditions of the Arlington Catholic field, but that their plans include a large enough layer of fiber that the crumb rubber would be protected. A. Duffy said that they cannot guarantee that the crumb rubber will not be exposed to any sunlight, but that it will be significantly more shaded than tire abrade on a highway, as the fiber layer will form a constant shadow. Different types of field carpet exist; the product that the Building Committee intends to use has a tall fiber height, as well as shorter fibers that grip the crumb rubber, reducing the likelihood that the rubber will migrate.
- N. Stevens asked about the plans for clearing the field of snow. M. Janger said that in his eleven years as principal, they have only once had to clear the fields of snow, and it was done by the turf company. J. Thielman said that they would follow the instructions of the turf company to do so safely.
- C. Tirone said that his understanding is that the field would be filled up as much as possible with crumb rubber, which would then be shifted around by weather conditions. He asked how often maintenance and grooming of the field would happen, and whether the Building Committee owns the equipment necessary to do the maintenance. Without regular maintenance, crumb rubber will end up outside of the field area. J. Thielman said that a maintenance plan is attached to the memo shared with the Commission. Some of the maintenance will be done by school staff, and some will be done by a contractor.
- C. Tirone asked if the treatment train is an isolated system or if it accepts infiltration from other sources. K. Allison-Ampe said that it is an isolated system and will not accept water from any other source.
- N. Stevens said that the Commission needs to check the existing Order of Conditions to see if the maintenance plan is included in it. D. Morgan said that the maintenance plan is not in the Order of Conditions; J. Thielman said that they would include that as an amendment.





- Discussion of the procedural issues involved in extending and/or amending an Order of Conditions followed.
- S. Chapnick noted that, although issues such as playing time and player safety are not in the purview of the Commission, the Artificial Turf Study Committee has clearly stated in its draft report that alternatives to crumb rubber infill should be used because of its negative impacts to human health, safety, and the environment.
- S. Chapnick stated that the Commission's review of the permit extension request is concerned with environmental issues, particularly as they affect Mill Brook. In 2020, the Commission placed specific conditions on testing the field materials, including the crumb rubber. Those tests must meet the regulatory requirements put forth by the Commission. The Commission did not require testing for 6PPD-quinone, because it was not discovered as a potential aquatic toxin until 2021, so it is important that the Commission consider that issue now. She noted that tire crumb rubber contains some amount of 6PPD-quinone. K. Allison-Ampe agreed, but said that it would remain within the field and, because of the filtration system in place, not run off into Mill Brook. S. Chapnick said that bio-retention basins have been shown to reduce the amount of 6PPD-quinone from getting into the environment, but the field filtration system does not include bio-retention basins. K. Allison-Ampe said that the filtration system contains some components of bio-retention basins.
- S. Chapnick noted that when a Commission considers a request for a permit extension, the Commission may deny the request in cases "where new information, not available at the time the permit was issued, has become available and indicates that the permit is not adequate to protect the resource area values protected by the Bylaw." Since the original permit, it has been established that tire crumb rubber can contain 6PPD-quinone, and that 6PPD-quinone is toxic to fish at extremely low concentrations. She noted that the filtration system may prevent crumb rubber from ending up in Mill Brook, but that does not prevent the chemicals coming off it from ending up in the brook. S. Chapnick concludes that used-tire-derived material may already contain 6PPD-quinone and may have the opportunity for 6PPD to convert to 6PPD-quinone. An EPA draft method for evaluating 6PPD-quinone just came out in January 2024, and will likely be finalized this year. Many labs are already using this test.
- K. Allison-Ampe noted that most of the crumb rubber material lost from turf fields is not lost through surface water. A recent literature review suggests that only 125 kg of the material is lost through surface water and ends up in drains. Another review suggests that Arlington residents generate between 135 and 250 metric tons of tireware particles per year, a vastly larger amount than results from crumb rubber materials in surface water. She also noted that Peirce field, AHS's current artificial turf field, is not packed to overflowing with crumb rubber, and future fields would not be over-filled either.
- N. Stevens said that he would like the Building Committee to apply to amend the Order of Conditions to include the maintenance plan and the use of the filtration baskets. Those amendments and the extension request could both be considered at the same hearing. C. Tirone noted that the application to amend the Order of Conditions could not be considered at the Commission's next meeting due to the application deadline. The hearing would have to be scheduled for May 2, at which the Order of Conditions would first be amended and then extended.



- S. Chapnick noted that there is precedent from DEP for a superseding Order of Conditions to allow the field to proceed with conditions, including monitoring of the stormwater coming out of the field before it goes into the resource area. She would like the Building Committee to consider a monitoring well that would monitor for 6PPD-quinone. B. McBride agreed.
  - C. Tirone noted that the Commission cannot require the Building Committee to apply for an amendment to the Order of Conditions.
  - C. Tirone summarized the items that the Commission have asked the Building Committee to provide before the hearing: a cut sheet for the filter basket, the study on sand filters, the study on tire road particulates. The Commission would also like the Building Committee to apply for an amendment to the Order of Conditions, including maintenance specs and a monitoring well and program.
  - S. Garvin noted that they have already applied for a permit extension, the hearing for which is scheduled for April 18. If they choose to file an application for an amendment to the Order of Conditions, that hearing would be scheduled on May 2. They may choose to postpone the hearing for the permit extension until May 2, but the hearing is currently scheduled for April 18.
  - M. Gildesgame asked what the testing standard would be if a monitoring well is installed. S. Chapnick said that she would propose the number that caused fish kills in a peer-reviewed paper. She proposed using the testing frequency that the DEP approved for a test well in Wilmington, which N. Stevens can provide information about.
5. Eagle Scout Proposal for Arlington Great Meadows. [1:49:00]
- Ben Gregory, from Troop 313 based in Arlington, has proposed an Eagle Scout project at Arlington Great Meadows. He has been working with D. White on planning an Eagle Scout Project.
  - The proposed project is to build a sign that reads “Arlington’s Great Meadows” at the Emerson Gardens entrance and a new kiosk at the Sheila Road entrance. The new kiosk will be modeled on the current kiosk at the Waldorf School entrance. It will be constructed of pressure-treated lumber, with 6x6 posts. If permitted, he would like to use concrete to secure the posts of both the kiosk and the sign.
  - The estimated cost is approximately \$550, which will be raised by the Troop. He hopes to have the project completed by mid- to late-April. His grandfather, who has construction experience, will help with the carpentry.
  - D. White said that using concrete should be fine because it is not near a resource area.
  - The Commission members appreciated the proposal and thanked B. Gregory for taking on the project.
  - D. White made a motion to approve the project. N. Stevens seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |
| D. White – yes  |                   |                     |
- Motion passed.



6. 47 Spy Pond Lane Certificate of Compliance. [2:01:12]

- R. Clapp said that the Commission issued an Order of Conditions in 2020 for construction of a single-family house at 47 Spy Pond Lane. A previous site visit confirmed compliance with the Order of Conditions, except that the owner had constructed a chain link fence that blocked the passage of wildlife next to the resource area. The property owner has since cut three gaps in the fence, each of which are about four to six inches from the ground and about three feet long, to allow for the movement of wildlife.
- Overall, the project is in compliance with the Order of Conditions, and R. Clapp recommends that the Commission issue a Certificate of Compliance.
- N. Stevens made a motion to issue a Certificate of Compliance for 47 Spy Pond Lane. D. Kaplan seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |
| D. White – yes  |                   |                     |

Motion passed.

7. 19 Sheraton Park Certificate of Compliance. [2:05:54]

- D. Morgan said that the Commission issued an Order of Conditions in 2011. The only item not completed by the time the permit was expired was the installation of dry wells. The owners asked for a Certificate of Compliance in 2022, but the Commission noted that the work was not complete. The Commission issued an RDA for the completion of the work required by the original Order. R. Clapp conducted a site visit and found it to be in compliance.
- D. Kaplan made a motion to issue a Certificate of Compliance for 19 Sheraton Park, and N. Stevens seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |
| D. White – yes  |                   |                     |

Motion passed.

### III. Hearings

1. **Request for Determination of Applicability: 36 Peabody Road (Continued from 3/21/2024).** [2:09:34]

- This public hearing will consider a Request for Determination of Applicability for an addition to the existing structure at 36 Peabody Road in Arlington along with landscaping and hardscaping activities within the 100-foot Buffer Zone and Adjacent Upland Resource Area to Spy Pond.
- S. Chapnick reported that the project is to repair walls that are failing due to improper installation and the steepness of the grade. The project also includes an addition to the house with a minor intrusion into the 100-foot buffer zone and the Adjacent Upland Resource Area (AURA) to Spy Pond.



- S. Chapnick, N. Stevens, M. Gildesgame, B. McBride, and C. Tirone conducted a site visit, with the owners present. They saw an example of the type of wall the owners plan to install. They also saw the terracing of the steep hill, which includes extensive native plantings. The Commission previously expressed concern with the placement of the walls; at the site visit, the Commissioners agreed that the proposed placement of the walls is necessary due to the erosion. The owners also plan to move one tree and remove two trees, one of which is hazardous, as well as plant several new trees.
- S. Chapnick expressed uncertainty about whether this work should be an RDA or an NOI, given that it is stonework. All the work will be done by hand, and it will include erosion controls.
- Eliza Hatch, the homeowner, said that they plan to move the wall and repair the staircase, all by hand. They plan to place erosion control at the bottom of the hill, where the slope gets less steep.
- C. Tirone said that the owners have taken great care of the property and the resource area. Given all the care that they've taken, he has no problem with approving this work as an RDA.
- M. Gildesgame agreed that the owners have done a good job stabilizing a very steep slope.
- S. Chapnick opened the hearing to public comment. Seeing no one who wished to speak, she closed public comment.
- N. Stevens made a motion to close the hearing. M. Gildesgame seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |
| D. White – yes  |                   |                     |

Motion passed.

- C. Tirone made a motion to issue a positive negative determination to the RDA, with the condition of a 20-foot section of erosion control at the bottom of the hill, to be reviewed by the Conservation Agent prior to work. N. Stevens seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |
| D. White – yes  |                   |                     |

Motion passed.

## 2. DEP #091-0278: Amendment to Order of Conditions: 88 Coolidge Road (Continued from 3/21/2024). [2:22:15]

- This public hearing will consider the peer review report for an amendment to an Order of Conditions for construction of a new house at 88 Coolidge Road in the Buffer Zone to a Bordering Vegetated Wetland. The applicant requested that the hearing be continued to April 18, 2024.



- N. Stevens made a motion to continue the hearing to April 18, 2024. B. McBride seconded the motion. A roll call vote was taken:
  - C. Tirone – yes
  - S. Chapnick – yes
  - M. Gildesgame – yes
  - D. Kaplan – yes
  - B. McBride – yes
  - N. Stevens – yes
  - D. White – yes

Motion passed.

**3. DEP #091-0356: Notice of Intent: Thorndike Place (Continuation from 3/21/2024).**

**[2:23:09]**

- The Conservation Commission will hold a public hearing under the Wetlands Protection Act to consider a Notice of Intent for the construction of Thorndike Place, a multifamily development on Dorothy Road in Arlington. Continued Planting Plan/Habitat discussion including Invasive Species Management Plan, and, if time allows, continued stormwater discussion.
- D. White recused himself from the hearing and left the meeting.
- The applicant was represented by Matt Burne, BSC Group Senior Ecologist, Tom Groves, BSC Group Senior Botanist, Dominic Rinaldi, BSC Group Civil Engineer, Stephanie Kiefer, Project Attorney, John Hessian, Consulting Engineer, and Scott Oran and Mark Dufton, Dinosaur Capital Partners.
- M. Burne noted that peer reviewer SWCA issued a letter in February with 10 comments relating to the planting plan and invasive species management. SWCA issued a follow-up letter on March 27, which said that all but one of their comments had been adequately addressed. The only remaining comment was 2-1, which recommended that the Invasive Species Management Plan (ISMP) be submitted for review, which was done. The SWCA response 2-2 expressed their experience in effective ways to manage sites similar to the proposed project, using an adaptive management approach. It also said that there are consistent issues throughout the ISMP of misrepresenting the proposed concentrations of herbicide, and not mentioning the choice of herbicide label must be followed. M. Burne said that the whole purpose of the ISMP is to be an adaptive management plan, using a combined approach that ultimately reduces the need for chemical controls.
- T. Groves said that the ISMP includes two main approaches – the first is a primarily chemical approach but includes a mulching option; the second is a chemical, mechanical, and chemical approach, dependent on species. Japanese knot weed does not respond well to a mechanical approach first, so it is best to use a chemical approach first, followed by mechanical cutting, and then another chemical application. The timetable included in the ISMP allows for some variability of start times, since the construction timetable is unknown. The construction should not be an impediment to treatment.
- S. Chapnick said that the Commission is concerned about the use of glyphosate. She quoted an NIH study saying that exposure to glyphosate-based herbicides cause neurotoxic effects in humans, rodents, fish, and invertebrates. T. Groves replied that much of the information relating to glyphosate is based on industrial farming, which generally applies glyphosate throughout the growing season to unhealthy soil, which results in a lot of runoff. Many agencies use glyphosate,



because it has been used for a long time and has been well-studied, and it is the safest herbicide to use in these situations. The herbicide proposal in the ISMP is a wetland herbicide with a non-ionic surfactant. In an ecosystem application, it is applied once a season in small amounts, directly to the surface area, so it stays within the root system, with little runoff. At this location, the wetland is not close to where the treatment would take place. The invasive plants being treated are also destructive to the environment, more so than glyphosate would be. He estimated that less than a quart of herbicide would be used to get the invasive species under control, which is minimal compared to the amount of effort and money it would take to use a mechanical method, which would also ultimately not solve the problem.

- S. Chapnick asked if there are safer alternatives to glyphosate. She noted that many countries have banned glyphosate. T. Groves replied that glyphosate is the safest herbicide for these situations, and banning glyphosate will lead to the use of more dangerous chemicals.
- S. Chapnick also asked if they can avoid using air spray. T. Groves replied that he has proposed a low-volume, low-pressure backpack sprayer. In his experience, using stem-injection or cut-stump techniques on Japanese knotweed results in putting the herbicide into water within the plant, diluting it. The concentration required for that type of treatment is higher than what is allowable per acre. Using a low-pressure spray treatment is very targeted and more effective than stem injection. Even if the spray gets on nearby native plants, it will not kill those plants as long as the whole plant is not treated.
- S. Chapnick also asked if using the herbicide will harm newly planted plants that are part of the landscaping plan. T. Groves replied that for glyphosate to kill a plant, it must be applied to the leaf surface or an open wound on the plant; it does not work in the soil, so will not harm other nearby plantings. The return interval is four hours, so it would be safe to re-enter an area four hours after treatment.
- S. Chapnick asked if the applicant could do a treatment plan with no spraying at all. T. Groves said that using a spray is the only way to effectively treat Japanese knotweed. The ISMP does include mechanical treatment of other species.
- M. Gildesgame asked how long it would take to control the Japanese knotweed. T. Groves replied that with the methods laid out in the ISMP, he could achieve 95% control within a year. The ISMP does include a follow-up, because seedlings will reappear, but the follow-up may not be needed in the first year after a treatment. Monitoring the site is important.
- D. Kaplan asked if wiping herbicide on the plant would result in sufficient coverage to be effective, rather than spraying. He also asked if there should be no-spray buffer zones near the wetlands. T. Groves replied that the backpack sprayers result in very little drift; they can be closely targeted, and the droplets are large enough not to drift. He also said that wiping requires a heavier substance, so that it doesn't drip, and it doesn't work well on knotweed. Wiping works better with fragmites. Japanese knotweed is primarily a monoculture, so it's unlikely that a spray would hit native plants.
- D. Kaplan expressed concern that using mulch to smother invasives would prevent other groundcover to grow. T. Groves said that the site includes a large amount of garlic mustard, which is very tenacious and changes the soil chemistry. The mulch





would both kill the garlic mustard and help to rebuild the soil, which would enable other groundcover to grow in the future. He proposed three inches of mulch in the areas with garlic mustard.

- C. Tirone asked if the ISMP includes recommendations of nozzle and droplet size. T. Groves said that backpack sprayers generally come with either wands or guns, which come with nozzle sizes already within particular parameters. Low-pressure backpack sprayers won't aerosolize the droplets. He also noted that there are laws about the conditions under which treatments can take place. The label outlines the requirements regarding conditions and application gear. S. Chapnick noted that the Commission has in the past placed conditions on spraying that are stricter than the requirements on the label.
- M. Burne noted that SWCA's response 2.2 says that the ISMP should be adaptive and not stick to an unchangeable schedule from year to year. He said that the ISMP is intended to be adaptive to when the project starts and what windows of opportunity will be available.
- SWCA also recommended that the ISMP be revised to indicate that label rates of herbicides will be followed. M. Burne noted that the label is the law, so a licensed applicator should follow it, and they did not think it necessary to include that in the ISMP. They can revise the ISMP to say that the label must be followed if necessary, but for professionals, that goes without saying.
- Chase Bernier from SWCA said that he agreed with a lot of what T. Groves and M. Burne said. This is a challenging site, with a lot of different species, and the ISMP approaches it well. Japanese knotweed is extremely difficult to control, and it requires herbicide to treat effectively.
- C. Tirone opened the floor to public comment:
  - Lisa Fredman, 63 Mott St – She found the discussion on glyphosate concerning. She is trained as an epidemiologist. Although epidemiology deals with large populations, most studies start with case studies and examples. Her friend's brother recently died of ALS. He was the first of a growing number of cases of relatively young people in Vermont dying of ALS who are presumed to have had exposure to algae growth and ponds where herbicides were used. The Mugar property is right next to the wetland. Every time she walks by Thorndike Field, there has been standing water. Use of herbicides on the property will move toward that standing water, which will effect the people who use and live near Thorndike Field. She thinks that epidemiologists should be included in this discussion.
    - S. Chapnick responded to say that while the Commission cares about human health, it's not in their purview; they need to focus on the environmental impact. She encouraged L. Fredman to share her comments with the Arlington Board of Health, because if there are issues involved that affect human health, they need to be involved.
    - T. Groves recommended that L. Fredman look at lawn-care companies. Herbicide and pesticide applicators are required to report to the state what herbicides and pesticides they use and in what quantities. That information is available to the public, so it's possible to see what has been used in any given neighborhood. Lawn care companies generally use far more of such



chemicals than the ecological industry, which uses them in very low quantities. Once a habitat is restored, you don't need to continue to use herbicides, but they are used year after year in lawn care, particularly in the golf industry.

- C. Tirone said that between the last two meetings, the Commission has received 11 emails from abutters and residents throughout Arlington, all of which are available on the Thorndike page of the Commission's website. Most of those had to do with groundwater testing.
- The Commission has completed the portion of the hearing dealing with the habitat and invasive management portion of the application, and going forward, will focus on the stormwater portion.
- D. Rinaldi said that the applicant has authorized the BSC Group to do more stormwater test pits and install a second well in the area of the large infiltration system, and to monitor those through April and into May. The installation will likely take place the week of April 15, so they would like to continue the hearing until May 2. C. Tirone said that the Commission would like someone representing the Town to witness the installation of the wells. D. Rinaldi said that he would communicate the installation date to D. Morgan.
- C. Tirone re-opened the floor to public comment:
  - Scott Horsley, water engineer representing the Arlington Land Trust – He would recommend that the applicant use continuous recording pressure transducers. Water levels vary frequently, and it's easy to miss high points without continuous recording.
    - D. Rinaldi replied that the current well on the site does not have continuous monitoring, and the new one is not intended to either. S. Chapnick asked BSC to consider using continuous monitoring, which could be easier to use than wells that require some to go to the site to collect the data. D. Rinaldi said that continuous monitoring is not required under the Wetlands Protection Act. C. Tirone asked how many times BSC expects to go to the site to collect data. D. Rinaldi said that they hope to do it at least weekly through the end of April and into May. C. Tirone asked if a representative of the Town could be present each time the well is checked, and D. Rinaldi replied that he would have to talk to the applicant about that.
- With the approval of the applicant, N. Stevens made a motion to continue the hearing to May 2, 2024. M. Gildesgame seconded the motion. A roll call vote was taken:

|                 |                   |                     |
|-----------------|-------------------|---------------------|
| C. Tirone – yes | S. Chapnick – yes | M. Gildesgame – yes |
| D. Kaplan – yes | B. McBride – yes  | N. Stevens – yes    |

Motion passed.

D. Kaplan made a motion to adjourn. The meeting adjourned at 10:20 PM.