LEC

WETLANDS WILDLIFE WATERWAYS

Notice of Intent Application

May 21, 2025

Subject Property

Revere High School

190 Veterans of Foreign Wars Parkway and Portions of Dunn Road

Revere, Massachusetts

Applicant/Property Owner

City of Revere

281 Broadway

Revere, Massachusetts

Project Team

LEC Environmental Consultants, Inc.

Leftfield Project Management

Perkins Eastman DPC

Nitsch Engineering

Warner Larson Landscape Architects

Mikyoung Kim Design

Sanborn Head

Consigli Construction

VHB

LEC WETLANDS WILDLIFE WATERWAYS

May 21, 2025

Electronic/Hand Delivery

Revere Conservation Commission
249R Broadway
Revere, MA 02151

Re: Notice of Intent Application [LEC File #: PEB\22-241.01]
Revere High School
190 Veterans of Foreign Wars Parkway
(Parcels: 9/154B/1, 9/174A/1A, 9/174B/1A, 9/174C/1A, 9/174D/1A, and 9/175/1A)
and Portions of Dunn Road
Revere, Massachusetts

Dear Members of the Conservation Commission:

On behalf of the Applicant, The City of Revere, LEC Environmental Consultants, Inc., (LEC) is filing the enclosed Notice of Intent (NOI) Application with the Revere Conservation Commission for construction of Revere High School at 190 Veterans of Foreign Wars Parkway in Revere. Proposed work activities include removal of vegetation and pavement, and construction of a new four-story, podium style, 422,500± gross square foot building; internal paved driveways; paved parking lots; synthetic turf athletic fields and tennis courts; stormwater management infrastructure; outdoor classrooms; grading; and landscape plantings. The new 2,450 student district-wide school is intended to replace the existing undersized, 50-year-old Revere High School, located at 101 School Street, and alleviate systemwide overcrowding.

The project also includes remediation of hazardous materials identified for remediation through the requirements set forth in the *Massachusetts Contingency Plan* (MCP, 310 CMR 40.0000), which include excavation of contaminated soil from developed areas within Land Subject to Coastal Storm Flowage, Bordering Land Subject to Flooding, Riverfront Area, and the 100-foot Buffer Zone. Therefore, this portion of the project is being filed in accordance with the Limited Project provisions at 310 CMR 10.53(3)(q) which allow MCP-mandated cleanup work in Wetland Resource Areas with appropriate mitigation.

Portions of the proposed work are located within Bordering Vegetated Wetland, Bank, Previously Developed and/or Degraded Riverfront Area, Bordering Land Subject to Flooding, Land Subject to Coastal Storm Flowage, and the 100-foot Buffer Zone; areas protectable under the *Massachusetts*

Wetlands Protection Act (M.G.L. c. 131, s. 40) and its implementing Regulations (310 CMR 10.00), and the *Revere, MA Code of Ordinances Chapter 16.04 - Wetlands Protection* (the *Ordinance*). The proposed project also is located within a non-bordering Freshwater Wetland only protectable under the *Ordinance*.

Thank you for considering this NOI Application. We look forward to further discussing the project with the Conservation Commission at the June 4, 2025 Public Hearing. If you have any questions, please do not hesitate to contact me in our Plymouth office at 508-746-9491 or at choogeboom@lecenvironmental.com.

Sincerely,

LEC Environmental Consultants, Inc.

Claire A. Hoogeboom
Wetland Scientist

Ann M. Marton, President
Director of Ecological Services

cc: DEP, Northeast Region
City of Revere
Perkins Eastman DPC
Leftfield Project Management
Nitsch Engineering
Warner Larson Landscape Architects
Mikyoung Kim Design
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Appendix D

D1: Resource Area Graphics (Existing vs. Proposed), (Fig-1 through Fig-6), prepared by Nitsch Engineering, dated May 21, 2025

D2: Impervious Area Plan, prepared by Nitsch Engineering, dated May 21, 2025

D3: Proposed Drainage Outfall Map, prepared by Nitsch Engineering, dated May 21, 2025

D4: Flood Progression and Recession Figure (Existing Conditions), prepared by Nitsch Engineering, dated May 21, 2025

D5: Flood Progression and Recession Figure (Proposed Conditions), prepared by Nitsch Engineering, dated May 21, 2025

Appendix E

E1: Cut/Fill Analysis, prepared by Nitsch Engineering, May 21, 2025

E2: Compensatory Flood Storage Graphics and Calculations, prepared by Nitsch Engineering, May 21, 2025

Appendix F

Invasive Species Management Plan, prepared by LEC, dated May 21, 2025

Appendix G

Alternative Layouts

*Plan of Land In Revere, Mass. (*No 21339-A), prepared by Whitman & Howard, Civil Engineers, dated July, 1948 (Cert. of Title No. 55730)

Appendix H

Wildlife Habitat Evaluation - Appendix A

CAPS Index of Ecological Integrity Map - Revere, MA

Attachment I

Stormwater Report, prepared by Nitsch Engineering, dated May 21, 2025

Attachment J

Plan to Accompany Notice of Intent, prepared by Nitsch Engineering, Mikyoung Kim Design, and Warner Larson, dated May 21, 2025

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

WPA Form 3 – Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40
Revere, MA Code of Ordinances, Chapter 16.04 – Wetlands Protection

Provided by MassDEP:
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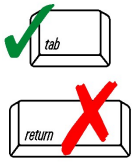
Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



Note: Before completing this form consult your local Conservation Commission regarding any municipal bylaw or ordinance.

A. General Information

1. Project Location (**Note:** electronic filers will click on button to locate project site):

190 Veterans of Foreign Wars Parkway — a. Street Address
Revere — b. City/Town
02151 — c. Zip Code

Latitude and Longitude:
42.41297 — d. Latitude
-70.99507 — e. Longitude

9 — f. Assessors Map/Plat Number
154B/1, 174A/1A, 174B/1A, 174C/1A, 174D/1A & 175/1A — g. Parcel /Lot Number

2. Applicant:

Mayor Patrick — a. First Name
Keefe, Jr. — b. Last Name
City of Revere — c. Organization
281 Broadway — d. Street Address
Revere — e. City/Town
MA — f. State
02151 — g. Zip Code
781-286-8111 — h. Phone Number
i. Fax Number
pkeefe@revere.org — j. Email Address

3. Property owner (required if different from applicant): ☐ Check if more than one owner

Same as Applicant — a. First Name
b. Last Name
c. Organization
d. Street Address
e. City/Town
f. State
g. Zip Code
h. Phone Number
i. Fax Number
j. Email address

4. Representative (if any):

Claire — a. First Name
Hoogeboom — b. Last Name
LEC Environmental Consultants, Inc. — c. Company
12 Resnik Road, Suite 1 — d. Street Address
Plymouth — e. City/Town
MA — f. State
02360 — g. Zip Code
508-746-9491 — h. Phone Number
508-746-9492 — i. Fax Number
choogeboom@lecenvironmental.com — j. Email address

5. Total WPA Fee Paid (from NOI Wetland Fee Transmittal Form):

Fee Exempt — a. Total Fee Paid
b. State Fee Paid
c. City/Town Fee Paid

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A. General Information (continued)

6. General Project Description:

Removal of existing pavement and vegetation, and construction of a new four-story, podium style, 422,500± gross square foot high school building; internal paved driveways; paved parking lots; synthetic turf athletic fields, tennis courts; stormwater management; outdoor classrooms; grading; landscape plantings; and, remediation of hazardous materials identified through the Massachusetts Contingency Plan (310 MCP, CMR 40.0000). Portions of the proposed work are located within Bordering Vegetated Wetland, Bank, Previously Developed and/or Degraded Riverfront Area, Bordering Land Subject to Flooding, Land Subject to Coastal Storm Flowage, and the 100-foot Buffer Zone.

7a. Project Type Checklist: (Limited Project Types see Section A. 7b.)

1. ☐ Single Family Home
2. ☐ Residential Subdivision
3. ☐ Commercial/Industrial
4. ☐ Dock/Pier
5. ☐ Utilities
6. ☐ Coastal engineering Structure
7. ☐ Agriculture (e.g., cranberries, forestry)
8. ☐ Transportation
9. ☒ Other

7b. Is any portion of the proposed activity eligible to be treated as a limited project (including Ecological Restoration Limited Project) subject to 310 CMR 10.24 (coastal) or 310 CMR 10.53 (inland)?

1. ☒ Yes ☐ No

If yes, describe which limited project applies to this project. (See 310 CMR 10.24 and 10.53 for a complete list and description of limited project types)

310 CMR 10.53(3)(q) – remediation of, or other response to, a release or threat of release of oil and/or hazardous material identified under MCP.
310 CMR 10.53(6) for construction of footpaths in Riverfront Area.
2. Limited Project Type

If the proposed activity is eligible to be treated as an Ecological Restoration Limited Project (310 CMR10.24(8), 310 CMR 10.53(4)), complete and attach Appendix A: Ecological Restoration Limited Project Checklist and Signed Certification.

8. Property recorded at the Registry of Deeds for:

a. County	b. Certificate # (if registered land)
Suffolk	
c. Book	d. Page Number
68431	291

B. Buffer Zone & Resource Area Impacts (temporary & permanent)

1. ☐ Buffer Zone Only – Check if the project is located only in the Buffer Zone of a Bordering Vegetated Wetland, Inland Bank, or Coastal Resource Area.
2. ☒ Inland Resource Areas (see 310 CMR 10.54-10.58; if not applicable, go to Section B.3, Coastal Resource Areas).

Check all that apply below. Attach narrative and any supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

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B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

For all projects affecting other Resource Areas, please attach a narrative explaining how the resource area was delineated.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. ☒ Bank	20± permanent, 72± temp. (1. linear feet)	72± (restored) (2. linear feet)
b. ☒ Bordering Vegetated Wetland	226± temp. (1. square feet)	226± (restored) (2. square feet)
c. ☐ Land Under Waterbodies and Waterways	1. square feet 3. cubic yards dredged	2. square feet

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
d. ☒ Bordering Land Subject to Flooding	776,259± (1. square feet) 890,294.76 cf (32,973.88 cy) (3. cubic feet of flood storage lost)	1,459,702± (2. square feet) 1,028,448.09 cf (38,090.67 cy) (4. cubic feet replaced)
e. ☐ Isolated Land Subject to Flooding	1. square feet 2. cubic feet of flood storage lost	3. cubic feet replaced
f. ☒ Riverfront Area	Eastern County Ditch - inland (1. Name of Waterway (if available) - **specify coastal or inland**)	

2. Width of Riverfront Area (check one):

☐ 25 ft. - Designated Densely Developed Areas only

☐ 100 ft. - New agricultural projects only

☒ 200 ft. - All other projects

3. Total area of Riverfront Area on the site of the proposed project: 522,775± square feet

4. Proposed alteration of the Riverfront Area:

a. total square feet	b. square feet within 100 ft.	c. square feet between 100 ft. and 200 ft.
421,255±	206,609±	214,646±

5. Has an alternatives analysis been done and is it attached to this NOI? ☒ Yes ☐ No

6. Was the lot where the activity is proposed created prior to August 1, 1996? ☒ Yes ☐ No

3. ☒ Coastal Resource Areas: (See 310 CMR 10.25-10.35)

Note: for coastal riverfront areas, please complete **Section B.2.f**. above.

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B. Buffer Zone & Resource Area Impacts (temporary & permanent) (cont'd)

Check all that apply below. Attach narrative and supporting documentation describing how the project will meet all performance standards for each of the resource areas altered, including standards requiring consideration of alternative project design or location.

Online Users: Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

Resource Area	Size of Proposed Alteration	Proposed Replacement (if any)
a. ☐ Designated Port Areas	Indicate size under Land Under the Ocean, below	
b. ☐ Land Under the Ocean	1. square feet 2. cubic yards dredged	
c. ☐ Barrier Beach	Indicate size under Coastal Beaches and/or Coastal Dunes below	
d. ☐ Coastal Beaches	1. square feet	2. cubic yards beach nourishment
e. ☐ Coastal Dunes	1. square feet	2. cubic yards dune nourishment
	Size of Proposed Alteration	Proposed Replacement (if any)
f. ☐ Coastal Banks	1. linear feet	
g. ☐ Rocky Intertidal Shores	1. square feet	
h. ☐ Salt Marshes	1. square feet	2. sq ft restoration, rehab., creation
i. ☐ Land Under Salt Ponds	1. square feet 2. cubic yards dredged	
j. ☐ Land Containing Shellfish	1. square feet	
k. ☐ Fish Runs	Indicate size under Coastal Banks, inland Bank, Land Under the Ocean, and/or inland Land Under Waterbodies and Waterways, above 1. cubic yards dredged	
l. ☒ Land Subject to Coastal Storm Flowage	1,459,234± 1. square feet	

4. ☐ Restoration/Enhancement
If the project is for the purpose of restoring or enhancing a wetland resource area in addition to the square footage that has been entered in Section B.2.b or B.3.h above, please enter the additional amount here.

a. square feet of BVW
b. square feet of Salt Marsh

5. ☐ Project Involves Stream Crossings

a. number of new stream crossings
b. number of replacement stream crossings

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C. Other Applicable Standards and Requirements

☐ This is a proposal for an Ecological Restoration Limited Project. Skip Section C and complete Appendix A: Ecological Restoration Limited Project Checklists – Required Actions (310 CMR 10.11).

Streamlined Massachusetts Endangered Species Act/Wetlands Protection Act Review

1. Is any portion of the proposed project located in **Estimated Habitat of Rare Wildlife** as indicated on the most recent Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the Natural Heritage and Endangered Species Program (NHESP)? To view habitat maps, see the *Massachusetts Natural Heritage Atlas* or go to http://maps.massgis.state.ma.us/PRI_EST_HAB/viewer.htm.

   a. ☐ Yes ☒ No

   If yes, include proof of mailing or hand delivery of NOI to:

   Natural Heritage and Endangered Species Program
   Division of Fisheries and Wildlife
   1 Rabbit Hill Road
   Westborough, MA 01581

   August, 2021
   b. Date of map

   If *yes*, the project is also subject to Massachusetts Endangered Species Act (MESA) review (321 CMR 10.18). To qualify for a streamlined, 30-day, MESA/Wetlands Protection Act review, please complete Section C.1.c, and include requested materials with this Notice of Intent (NOI); *OR* complete Section C.2.f, if applicable. *If MESA supplemental information is not included with the NOI, by completing Section 1 of this form, the NHESP will require a separate MESA filing which may take up to 90 days to review (unless noted exceptions in Section 2 apply, see below).*

   c. Submit Supplemental Information for Endangered Species Review*

      1. ☐ Percentage/acreage of property to be altered:

         (a) within wetland Resource Area _____ percentage/acreage

         (b) outside Resource Area _____ percentage/acreage

      2. ☐ Assessor's Map or right-of-way plan of site

2. ☐ Project plans for entire project site, including wetland resource areas and areas outside of wetlands jurisdiction, showing existing and proposed conditions, existing and proposed tree/vegetation clearing line, and clearly demarcated limits of work **

   (a) ☐ Project description (including description of impacts outside of wetland resource area & buffer zone)

   (b) ☐ Photographs representative of the site

* Some projects **not** in Estimated Habitat may be located in Priority Habitat, and require NHESP review (see https://www.mass.gov/ma-endangered-species-act-mesa-regulatory-review).
Priority Habitat includes habitat for state-listed plants and strictly upland species not protected by the Wetlands Protection Act.

** MESA projects may not be segmented (321 CMR 10.16). The applicant must disclose full development plans even if such plans are not required as part of the Notice of Intent process.

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C. Other Applicable Standards and Requirements (cont'd)

(c) ☐ MESA filing fee (fee information available at https://www.mass.gov/how-to/how-to-file-for-a-mesa-project-review).
Make check payable to "Commonwealth of Massachusetts - NHESP" and ***mail to NHESP*** at above address

*Projects altering **10 or more acres** of land, also submit:*

(d) ☐ Vegetation cover type map of site

(e) ☐ Project plans showing Priority & Estimated Habitat boundaries

(f) OR Check One of the Following

1. ☐ Project is exempt from MESA review.
Attach applicant letter indicating which MESA exemption applies. (See 321 CMR 10.14, https://www.mass.gov/service-details/exemptions-from-review-for-projectsactivities-in-priority-habitat; the NOI must still be sent to NHESP if the project is within estimated habitat pursuant to 310 CMR 10.37 and 10.59.)

2. ☐ Separate MESA review ongoing. a. NHESP Tracking # b. Date submitted to NHESP

3. ☐ Separate MESA review completed.
Include copy of NHESP "no Take" determination or valid Conservation & Management Permit with approved plan.

3. For coastal projects only, is any portion of the proposed project located below the mean high water line or in a fish run?

a. ☐ Not applicable – project is in inland resource area only b. ☐ Yes ☒ No

If yes, include proof of mailing, hand delivery, or electronic delivery of NOI to either:

South Shore - Bourne to Rhode Island border, and the Cape & Islands:

Division of Marine Fisheries -
Southeast Marine Fisheries Station
Attn: Environmental Reviewer
836 South Rodney French Blvd.
New Bedford, MA 02744
Email: dmf.envreview-south@mass.gov

North Shore - Plymouth to New Hampshire border:

Division of Marine Fisheries -
North Shore Office
Attn: Environmental Reviewer
30 Emerson Avenue
Gloucester, MA 01930
Email: dmf.envreview-north@mass.gov

Also if yes, the project may require a Chapter 91 license. For coastal towns in the Northeast Region, please contact MassDEP's Boston Office. For coastal towns in the Southeast Region, please contact MassDEP's Southeast Regional Office.

c. ☐ Is this an aquaculture project? d. ☐ Yes ☒ No

If yes, include a copy of the Division of Marine Fisheries Certification Letter (M.G.L. c. 130, § 57).

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C. Other Applicable Standards and Requirements (cont'd)

Online Users: Include your document transaction number (provided on your receipt page) with all supplementary information you submit to the Department.

4. Is any portion of the proposed project within an Area of Critical Environmental Concern (ACEC)?

   a. ☐ Yes ☒ No If yes, provide name of ACEC (see instructions to WPA Form 3 or MassDEP Website for ACEC locations). **Note:** electronic filers click on Website.

   b. ACEC

5. Is any portion of the proposed project within an area designated as an Outstanding Resource Water (ORW) as designated in the Massachusetts Surface Water Quality Standards, 314 CMR 4.00?

   a. ☐ Yes ☒ No

6. Is any portion of the site subject to a Wetlands Restriction Order under the Inland Wetlands Restriction Act (M.G.L. c. 131, § 40A) or the Coastal Wetlands Restriction Act (M.G.L. c. 130, § 105)?

   a. ☐ Yes ☒ No

7. Is this project subject to provisions of the MassDEP Stormwater Management Standards?

   a. ☒ Yes. Attach a copy of the Stormwater Report as required by the Stormwater Management Standards per 310 CMR 10.05(6)(k)-(q) and check if:

      1. ☐ Applying for Low Impact Development (LID) site design credits (as described in Stormwater Management Handbook Vol. 2, Chapter 3)

      2. ☒ A portion of the site constitutes redevelopment

      3. ☐ Proprietary BMPs are included in the Stormwater Management System.

   b. ☐ No. Check why the project is exempt:

      1. ☐ Single-family house

      2. ☐ Emergency road repair

      3. ☐ Small Residential Subdivision (less than or equal to 4 single-family houses or less than or equal to 4 units in multi-family housing project) with no discharge to Critical Areas.

D. Additional Information

☐ This is a proposal for an Ecological Restoration Limited Project. Skip Section D and complete Appendix A: Ecological Restoration Notice of Intent – Minimum Required Documents (310 CMR 10.12).

Applicants must include the following with this Notice of Intent (NOI). See instructions for details.

Online Users: Attach the document transaction number (provided on your receipt page) for any of the following information you submit to the Department.

1. ☒ USGS or other map of the area (along with a narrative description, if necessary) containing sufficient information for the Conservation Commission and the Department to locate the site. (Electronic filers may omit this item.)

2. ☒ Plans identifying the location of proposed activities (including activities proposed to serve as a Bordering Vegetated Wetland [BVW] replication area or other mitigating measure) relative to the boundaries of each affected resource area.

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D. Additional Information (cont'd)

3. ☒ Identify the method for BVW and other resource area boundary delineations (MassDEP BVW Field Data Form(s), Determination of Applicability, Order of Resource Area Delineation, etc.), and attach documentation of the methodology.

4. ☒ List the titles and dates for all plans and other materials submitted with this NOI.

Plans to Accompany Notice of Intent
a. Plan Title

Nitsch Engineering
b. Prepared By

David Conway, No. 40068
c. Signed and Stamped by

May 21, 2025
d. Final Revision Date

1" = 20'
e. Scale

Stormwater Report
f. Additional Plan or Document Title

May 21, 2025
g. Date

5. ☐ If there is more than one property owner, please attach a list of these property owners not listed on this form.

6. ☐ Attach proof of mailing for Natural Heritage and Endangered Species Program, if needed.

7. ☐ Attach proof of mailing for Massachusetts Division of Marine Fisheries, if needed.

8. ☒ Attach NOI Wetland Fee Transmittal Form

9. ☒ Attach Stormwater Report, if needed.

E. Fees

1. ☒ Fee Exempt: No filing fee shall be assessed for projects of any city, town, county, or district of the Commonwealth, federally recognized Indian tribe housing authority, municipal housing authority, or the Massachusetts Bay Transportation Authority.

Applicants must submit the following information (in addition to pages 1 and 2 of the NOI Wetland Fee Transmittal Form) to confirm fee payment:

2. Municipal Check Number

3. Check date

4. State Check Number

5. Check date

6. Payor name on check: First Name

7. Payor name on check: Last Name

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F. Signatures and Submittal Requirements

I hereby certify under the penalties of perjury that the foregoing Notice of Intent and accompanying plans, documents, and supporting data are true and complete to the best of my knowledge. I understand that the Conservation Commission will place notification of this Notice in a local newspaper at the expense of the applicant in accordance with the wetlands regulations, 310 CMR 10.05(5)(a).

I further certify under penalties of perjury that all abutters were notified of this application, pursuant to the requirements of M.G.L. c. 131, § 40. Notice must be made by Certificate of Mailing or in writing by hand delivery or certified mail (return receipt requested) to all abutters within 100 feet of the property line of the project location.

1. Signature of Applicant PATRICK M. KEEFE JR.	2. Date 5/20/25
3. Signature of Property Owner (if different)	4. Date
5. Signature of Representative (if any) Claire Hayboer	6. Date 5/20/2025

For Conservation Commission:
Two copies of the completed Notice of Intent (Form 3), including supporting plans and documents, two copies of the NOI Wetland Fee Transmittal Form, and the city/town fee payment, to the Conservation Commission by certified mail or hand delivery.

For MassDEP:
One copy of the completed Notice of Intent (Form 3), including supporting plans and documents, one copy of the NOI Wetland Fee Transmittal Form, and a **copy** of the state fee payment to the MassDEP Regional Office (see Instructions) by certified mail or hand delivery.

Other:
If the applicant has checked the "yes" box in any part of Section C, Item 3, above, refer to that section and the Instructions for additional submittal requirements.

The original and copies must be sent simultaneously. Failure by the applicant to send copies in a timely manner may result in dismissal of the Notice of Intent.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

NOI Wetland Fee Transmittal Form

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.

A. Applicant Information

1. Location of Project:

190 Veterans of Foreign Wars Parkway	Revere
a. Street Address	b. City/Town
N/A	N/A
c. Check number	d. Fee amount

2. Applicant Mailing Address:

Mayor Patrick		Keefe, Jr.
a. First Name		b. Last Name
City of Revere		
c. Organization		
281 Broadway		
d. Mailing Address		
Revere	MA	02151
e. City/Town	f. State	g. Zip Code
781-286-8111		pkeefe@revere.org
h. Phone Number	i. Fax Number	j. Email Address

3. Property Owner (if different):

same		
a. First Name		b. Last Name
c. Organization		
d. Mailing Address		
e. City/Town	f. State	g. Zip Code
h. Phone Number	i. Fax Number	j. Email Address

B. Fees

To calculate filing fees, refer to the category fee list and examples in the instructions for filling out WPA Form 3 (Notice of Intent).

Fee should be calculated using the following process & worksheet. ***Please see Instructions before filling out worksheet.***

Step 1/Type of Activity: Describe each type of activity that will occur in wetland resource area and buffer zone.

Step 2/Number of Activities: Identify the number of each type of activity.

Step 3/Individual Activity Fee: Identify each activity fee from the six project categories listed in the instructions.

Step 4/Subtotal Activity Fee: Multiply the number of activities (identified in Step 2) times the fee per category (identified in Step 3) to reach a subtotal fee amount. Note: If any of these activities are in a Riverfront Area in addition to another Resource Area or the Buffer Zone, the fee per activity should be multiplied by 1.5 and then added to the subtotal amount.

Step 5/Total Project Fee: Determine the total project fee by adding the subtotal amounts from Step 4.

Step 6/Fee Payments: To calculate the state share of the fee, divide the total fee in half and subtract $12.50. To calculate the city/town share of the fee, divide the total fee in half and add $12.50.

Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands

NOI Wetland Fee Transmittal Form

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

B. Fees (continued)

Step 1/Type of Activity	Step 2/Number of Activities	Step 3/Individual Activity Fee	Step 4/Subtotal Activity Fee
N/A	N/A	N/A	Fee Exempt

Step 5/Total Project Fee:

Step 6/Fee Payments:

Total Project Fee:	Fee Exempt a. Total Fee from Step 5
State share of filing Fee:	Fee Exempt b. 1/2 Total Fee **less $**12.50
City/Town share of filling Fee:	Fee Exempt c. 1/2 Total Fee **plus** $12.50

C. Submittal Requirements

a.) Complete pages 1 and 2 and send with a check or money order for the state share of the fee, payable to the Commonwealth of Massachusetts.

Department of Environmental Protection
Box 4062
Boston, MA 02211

b.) **To the Conservation Commission:** Send the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and the city/town fee payment.

To MassDEP Regional Office (see Instructions): Send a copy of the Notice of Intent or Abbreviated Notice of Intent; a **copy** of this form; and a **copy** of the state fee payment. (E-filers of Notices of Intent may submit these electronically.)

AFFIDAVIT OF SERVICE

Under the *Massachusetts Wetlands Protection Act*

and the

City of Revere Wetlands Protection Ordinance

I, Sharon A. Sullivan, on behalf of the City of Revere, hereby certify under the pains and penalties of perjury that on May 22, 2025 I gave notification to abutters in compliance with the second paragraph of Massachusetts General Laws Chapter 131, Section 40, and 310 CMR 10.05 (4) (a), in connection with the following matter:

> A Notice of Intent filed under the *Massachusetts Wetlands Protection Act* and the *City of Revere Wetlands Protection Ordinance* by LEC Environmental Consultants, Inc., on behalf of the City of Revere, with the City of Revere Conservation Commission on May 21, 2025 for property located at 190 Veterans of Foreign Wars Parkway (Parcels: 9/154B/1, 9/174A/1A, 9/174B/1A, 9/174C/1A, 9/174D/1A, and 9/175/1A) and portions of Dunn Road in Revere, Massachusetts.

The form of notification, and a list of the abutters to whom it was given and their addresses, are attached to this Affidavit of Service.

Sharon A. Sullivan

Sharon A. Sullivan
Permitting Technician

5/22/2025
Date

LEC WETLANDS WILDLIFE WATERWAYS

May 22, 2025

Certificate of Mailing

«Name»
«Name2»
«Address»
«City», «State» «Zip»

Re: Notice of Intent Application [LEC File #: PEB\22-241.01]
190 Veterans of Foreign Wars Parkway
(Parcels: 9/154B/1, 9/174A/1A, 9/174B/1A, 9/174C/1A, 9/174D/1A, and 9/175/1A)
and Portions of Dunn Road
Revere, Massachusetts

Dear Abutter:

On behalf of the Applicant, the City of Revere, LEC Environmental Consultants, Inc. (LEC) has filed a Notice of Intent (NOI) Application with the Revere Conservation Commission for construction of Revere High School at 190 Veterans of Foreign Wars Parkway in Revere. Proposed work activities include removal of vegetation and pavement, and construction of a new four-story, podium style, 422,500± gross square foot building; internal paved driveways; paved parking lots; synthetic turf athletic fields and tennis courts; stormwater management infrastructure; outdoor classrooms; grading; and landscape plantings.

The NOI Application has been completed in accordance with the *Massachusetts Wetlands Protection Act* (M.G.L. c. 131, s. 40, the *Act*) and its implementing *Regulations* (310 CMR 10.00, the *Act Regulations*), and the *Revere, MA Code of Ordinances Chapter 16.04 - Wetlands Protection* (the *Ordinance*).

The report entitled *Notice of Intent Application* and accompanying site plans are available for review by the public by contacting the Revere Conservation Commission. A Public Hearing will be held at City Hall, 281 Broadway, City Council Chambers, on June 4, 2025 at 6:30 p.m., in accordance with the provisions of the *Act* and its implementing *Act Regulations*, and the *Ordinance*. Notice of the Public Hearing, including its date, time, and place, will be published at least five (5) days in advance in *The Revere Journal*. Notice of the Public Hearing also will be posted at the Revere City Hall at least 48 hours in advance. Please check the City/Conservation Commission website page for any updated information on the meeting.

Please do not hesitate to review the materials and/or attend the public hearing should you have questions or concerns about the proposed project.

Sincerely,

LEC Environmental Consultants, Inc.

Claire Hoogeboom
Wetland Scientist

LEC Environmental Consultants, Inc. www.lecenvironmental.com

12 Resnik Road	380 Lowell Street	100 Grove Street	P.O. Box 590	680 Warren Avenue
Suite 1	Suite 101	Suite 310	Rindge, NH 03461	Suite 3
Plymouth, MA 02360	Wakefield, MA 01880	Worcester, MA 01605		East Providence, RI 02914
508.746.9491	781.245.2500	508.753.3077	603.899.6726	401.685.3109
PLYMOUTH, MA	WAKEFIELD, MA	WORCESTER, MA	RINDGE, NH	EAST PROVIDENCE, RI

Notification to Abutters

By Hand Delivery, Certified Mail (return receipt requested), or Certificates of Mailing

This is a notification required by law. You are receiving this notification because you have been identified as the owner of land abutting another parcel of land for which certain activities are proposed. Those activities require a permit under the Massachusetts Wetlands Protection Act (M.G.L. c. 131, § 40) and Revere, MA Code of Ordinances Chapter 16.04 - Wetlands Protection (the *Ordinance*).

In accordance with the second paragraph of the Massachusetts Wetlands Protection Act, and 310 CMR 10.05(4)(a) of the Wetlands Regulations and the *Ordinance*, you are hereby notified that:

A. A Notice of Intent Application was filed with the Revere Conservation Commission on May 21, 2025 to:

> remove vegetation and pavement, and construct a new four-story, podium style, 422,500 gross square foot building, internal paved driveways, paved parking lots, synthetic turf athletic fields and tennis courts, stormwater management infrastructure, outdoor classrooms, grading, and landscape plantings.

B. The name of the applicant is: City of Revere.

C. The activities subject to protection under M.G.L. c. 131 §40 and the *Ordinance* are located at 190 Veterans of Foreign Wars Parkway (Parcels: 9/154B/1, 9/174A/1A, 9/174B/1A, 9/174C/1A, 9/174D/1A, 9/175/1A), and portions of Dunn Road.

D. Copies of the Notice of Intent Application may be examined or obtained at the Revere Conservation Commission, located at 249R Broadway or by contacting the Revere Conservation Commission at (781) 286-8185. The regular business hours of the American Legion Building are Monday thru Thursday 8:15 a.m. – 5:00 p.m., and Friday 8:15 a.m. – 12:15 p.m.

E. Copies of the Notice of Intent Application may be obtained from the applicant's representative, LEC Environmental Consultants, Inc., by calling (781) 245-2500. An administrative fee may be applied for providing copies of the NOI and plans.

F. Information regarding the date, time, and location of the public hearing regarding the Notice of Intent Application may be obtained from the Revere Conservation Commission. Notice of the public hearing will be published at least five business days in advance, in The Revere Journal.

Notification provided pursuant to the above requirement does not automatically confer standing to the recipient to request Departmental Action for the underlying matter. See 310 CMR 10.05(7)(a)4.

135 AMERICAN LEGION HWY 17-297-1B
LUC: 401
CLPF REVERE LLC
C/O CLARION PARTNERS, LLC
2323 VICTORY AVE
#1500
DALLAS, TX 75219

RAILROAD LOCATIO 5-120A1-7
LUC: 920
MASS BAY TRANS AUTHORITY
10 PARK PL
BOSTON, MA 02116

VFW PKWY 8-149-4
LUC: 423
MASSACHUSETTS ELECTRIC COMPANY
C/O PROPERTIES DEPT
40 SYLVAN RD
WALTHAM, MA 02451

120 VFW PKWY 8-149-6
LUC: 325
REVERE PARKWAY ROSEN TRUST
C/O REMIC PROPERTIES
POST OFFICE BOX 620626
NEWTON LOWER FALLS, MA 02462

151 VFW PKWY 8-156-2A
LUC: 323
UE REVERE LLC
210 ROUTE 4 EAST
PARAMUS, NJ 07652

VFW PKWY 8-156-3A
LUC: 323
UE REVERE LLC
210 ROUTE 4 EAST
PARAMUS, NJ 07652

VFW PKWY 8-156-7A
LUC: 920
COMMONWEALTH OF MASSACHUSETTS
20 SOMERSET ST
BOSTON, MA 02108

190 VFW PKWY 9-154B-1
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

1260 NORTH SHORE RD 9-155-1
LUC: 920
MASS BAY TRANS AUTHORITY
REAL ESTATE MGT DEPARTMENT
10 PARK PLAZA
BOSTON, MA 02116

1290 NORTH SHORE RD 9-155-2A
LUC: 326
WONDERLAND PROPERTIES LLC
303 BERKELEY ST
BOSTON, MA 02116

NORTH SHORE RD 9-155-4
LUC: 920
MASS BAY TRANS AUTHORITY
10 PARK PLAZA
BOSTON, MA 02116

NORTH SHORE RD 9-155-5
LUC: 920
MASS BAY TRANS AUTHORITY
REAL ESTATE MANAGEMENT DEPT
10 PARK PLAZA
BOSTON, MA 02116

1320 NORTH SHORE RD 9-155-6
LUC: 920
MASS BAY TRANS AUTHORITY
REAL ESTATE MANAGEMENT DEPT
10 PARK PLAZA
BOSTON, MA 02116

NORTH SHORE RD 9-173-21
LUC: 920
MASS BAY TRANS AUTHORITY
10 PARK PLAZA
BOSTON, MA 02116

NORTH SHORE RD 9-173-22
LUC: 920
MASS BAY TRANS AUTHORITY
10 PARK PLAZA
BOSTON, MA 02116

DUNN RD 9-174A-1A
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

BEACH TER 9-174B-1A
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

DOW ST 9-174C-1A
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

BANKS ST 9-174D-1A
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

DUNN RD 9-175-1A
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

58 SHAWMUT ST 9-179B-10
LUC: 101
MCKINLEY KATHLEEN R
MCKINLEY MAE I
58 SHAWMUT ST
REVERE, MA 02151

56 SHAWMUT ST 9-179B-11
LUC: 101
LEMUS JOSE E
56 SHAWMUT ST
REVERE, MA 02151

SHAWMUT ST 9-179B-12
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

52 SHAWMUT ST 9-179B-13
LUC: 101
HA HUY DO QUANG
NGUYEN QUYNH ANH
6 KELLY FARM WAY
BURLINGTON, MA 01803

SHAWMUT ST 9-179B-14
LUC: 930
CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

48 SHAWMUT ST 9-179B-15A
LUC: 101
JAOUAHIR KHALID
BEN MEHDI OUIJDAN
48 SHAWMUT ST
REVERE, MA 02151

44 SHAWMUT ST 9-179B-16C
LUC: 101
NICKERSON KENNETH J
NICKERSON DEBORAH A
44 SHAWMUT ST
REVERE, MA 02151

38 SHAWMUT ST 9-179B-17
LUC: 101
CURRAN JOHN D
JOSE-CURRAN VIOLETA
P O BOX 412
REVERE, MA 02151

36 SHAWMUT ST 9-179B-18
LUC: 101
FIGUEROA ANNEBELLE
36 SHAWMUT ST
REVERE, MA 02151

34 SHAWMUT ST 9-179B-19
LUC: 104
ORETO JOSEPH S JR
7 NEPONSET ST
REVERE, MA 02151

SHAWMUT ST 9-179B-20
LUC: 132

GALLEGO MARTHA E
28 SHAWMUT ST
REVERE, MA 02151

28 SHAWMUT ST 9-179B-21
LUC: 101

GALLEGO MARTHA E
28 SHAWMUT ST
REVERE, MA 02151

26 SHAWMUT ST 9-179B-22
LUC: 101

FILADORO DEBORAH A
FILADORO ROBERT W
26 SHAWMUT ST
REVERE, MA 02151

24 SHAWMUT ST 9-179B-23
LUC: 101

SANCHEZ ELFEGO JR
FEREGRINO SANCHEZ MARILYN J
24 SHAWMUT ST
REVERE, MA 02151

SHAWMUT ST 9-179B-24
LUC: 337

CIAMPA JOHN
53 WALDEMAR AVE
EAST BOSTON, MA 02128

68 SHAWMUT ST 9-179B-5
LUC: 104

ALBERICO DANDREA REVOCABLE TRUST
DANDREA ALBERICO, TRUSTEE
68 NEPONSET ST
Revere, MA 02151

SHAWMUT ST 9-179B-6
LUC: 132

ALBERICO DANDREA REVOCABLE TRUST
DANDREA ALBERICO, TRUSTEE
68 NEPONSET ST
Revere, MA 02151

64 SHAWMUT ST 9-179B-7
LUC: 101

CAROLYN COOK-CARRABBA FAMILY IRREVOCABLE TRUST
COOK JAMES DANA, TRUSTEE
64 SHAWMUT ST
REVERE, MA 02151

62 SHAWMUT ST 9-179B-8
LUC: 101

ISMAHILI AIDA
ISMAHILI ARBEN
62 SHAWMUT ST
Revere, MA 02151

SHAWMUT ST 9-179B-9
LUC: 930

CITY OF REVERE
281 BROADWAY
REVERE, MA 02151

SHAWMUT ST 9-179C-1
LUC: 337

CIAMPA JOHN
53 WALDEMAR AVE
EAST BOSTON, MA 02128

SHAWMUT ST 9-179C-2
LUC: 337

CIAMPA JOHN
53 WALDEMAR AVE
EAST BOSTON, MA 02128

SHAWMUT ST 9-179C-3
LUC: 325

CIAMPA JOHN
53 WALDEMAR AVE
EAST BOSTON, MA 02128

LEC

Notice of Intent Application

Revere High School
190 Veterans of Foreign Wars Parkway
& Portions of Dunn Road
Revere, Massachusetts

May 21, 2025

1. Introduction

On behalf of the Applicant, The City of Revere, LEC Environmental Consultants, Inc., (LEC) is filing the enclosed Notice of Intent (NOI) Application with the Revere Conservation Commission for construction of Revere High School at 190 Veterans of Foreign Wars Parkway in Revere. Proposed work activities include removal of vegetation and pavement, and construction of a new four-story, podium style, 422,500± gross square foot building; internal paved driveways; paved parking lots; synthetic turf athletic fields and tennis courts; stormwater management infrastructure; outdoor classrooms; grading; and landscape plantings.

The new 2,450 student district-wide school is intended to replace the existing undersized, 50-year-old Revere High School, located at 101 School Street, and alleviate systemwide overcrowding. Unlike typical developments where new construction is proposed to serve a need that does not presently exist; this project involves relocating an existing use, alleviating systemwide overcrowding, and accommodating anticipated growth in student population. The Site also provides a unique development opportunity, where a majority of the property is previously developed and degraded, and in need of improvement.

The project also includes remediation of hazardous materials identified for remediation through the requirements set forth in the through the *Massachusetts Contingency Plan* (MCP, 310 CMR 40.0000), which include excavation of contaminated soil from developed areas within Land Subject to Coastal Storm Flowage (LSCSF), Bordering Land Subject to Flooding (BLSF), Riverfront Area, and the 100-foot Buffer Zone. Therefore, this portion of the project is being filed in accordance with the Limited Project provisions at 310 CMR 10.53(3)(q) which allow MCP-mandated cleanup work in Wetland Resource Areas with appropriate mitigation.

Portions of the proposed work are located within Bordering Vegetated Wetland (BVW), Bank, Previously Developed and/or Degraded Riverfront Area, BLSF, LSCSF, and the 100-foot Buffer Zone; areas protectable under the *Massachusetts Wetlands Protection Act* (the *Act*, M.G.L. c. 131, s. 40) and its implementing Regulations (310 CMR 10.00), and the *Revere, MA Code of Ordinances Chapter 16.04 - Wetlands Protection* (the *Ordinance*). The proposed project also is located within a non-bordering Freshwater Wetland only protectable under the *Ordinance*.

Wetland Resource Area boundaries were peer reviewed by David Cameron of Fleetwood Environmental and confirmed by the Revere Conservation Commission through issuance

of an Order of Resource Area Delineation (ORAD, DEP File #061-0821) on June 10, 2024. The approved Wetland Resource Area boundaries and proposed activities are depicted on the *Plans to Accompany Notice of Intent* (*Plan*), prepared by Nitsch Engineering, Mikyoung Kim Design, and Warner Larson, dated May 21, 2025 (Attachment J). The extent of anticipated remediation activities is depicted on the attached *Approximate Area of Petroleum Remediation Graphic*, prepared by Sanborn Head, dated May 2025 (Appendix C). Nitsch Engineering also has prepared the attached *Stormwater Report*, dated May 21, 2025 containing the DEP Stormwater Checklist, Illicit Discharge Compliance Statement, and Operation & Management (O&M) Checklist (Attachment I).

2. General Site Description

The 33.08± acre site (the Site) is located at 190 VFW Parkway within the densely developed section of east-central Revere (Appendix A, Figures 1 and 2). The historically developed Site was previously occupied by the privately-owned Wonderland Greyhound Park (Wonderland), consisting of a dog racetrack, clubhouse, various buildings, and associated paved parking lot. The linear perennial ditch, referred to as the Eastern County Ditch (ECD) is located north of the former Wonderland. Wonderland was opened in June 1935 and permanently closed on August 19, 2010 as a result of the statewide ban on dog racing. The clubhouse and various buildings were demolished between 2017 and 2019, leaving remnant foundations in place. Since then, the Site has been generally vacant with the exception of miscellaneous land uses by the previous landowner and/or tenants, including vehicle storage and construction equipment staging.

The Site is located immediately north of the VFW Parkway, west of North Shore Road (Route 1A), and generally east of the Rockport/Newburyport Commuter Rail line and Dunn Road. The Wonderland Ballroom, MBTA Wonderland Station, and MBTA Wonderland parking garage and surface parking lot are located east of the Site. Residential development associated with Dunn Road and Shawmut Street is to the north, and the Wonderland Marketplace is to the south. The Site is largely occupied by a paved parking lot and remnant impervious foundations associated with the demolished clubhouse and buildings. The southwestern portion of the Site contains the former elevated dog racetrack, an interior non-bordering Freshwater Wetland protectable under the *Ordinance*, and forested uplands. The Site is bifurcated by the ECD with areas to the west comprised of mowed fields, forested uplands, remnant pavement and gravel, and a

BVW. Topography throughout the Site is generally flat, sloping gently upgradient in a southwesterly direction (el. 3 to el. 11).

Pockets of forested upland vegetation are comprised of a variably dense canopy of silver maple (*Acer saccarinum*), red pine (*Prunus resinosa*), little-leaf linden (*Tilia cordata*), quaking aspen (*Populus tremuloides*), tree-of-heaven (*Ailanthus altissima*), and black locust (*Robina pseudoacacia*). The variably dense understory contains saplings from the canopy, and staghorn sumac (*Rhus typhina*), with a shrub layer including a variety of invasive, non-native species including common buckthorn (*Rhamnus frangula*), multiflora rose (*Rosa multiflora*), Tatarian honeysuckle (*Lonicera tatarica*), Russian olive (*Elaeagnus angustifolia*), and dense patches of Japanese knotweed (*Fallopia japonica*). The groundcover consists of seedlings from the overstory, hay-scented fern (*Dennstaedtia punctilobula*), poison ivy (*Toxicodendron radicans*), and garlic mustard (*Allaria petiolata*). Entanglements of common greenbrier (*Smilax rotundifolia*), poison ivy, and Asiatic bittersweet (*Celastrus orbiculatus*) are common in the lianas layer.

2.1 Natural Heritage and Endangered Species Program Designation

According to the 15th Edition of the *Massachusetts Natural Heritage Atlas* (effective August 1, 2021) published by the Natural Heritage & Endangered Species Program (NHESP), no areas of Estimated Habitats of Rare Wildlife or Priority Habitat of Rare Species, or Potential or Certified Vernal Pools exist on the Site (Appendix A, Figure 2).

2.2 Floodplain Designation

According to the March 16, 2016 Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) map for the City of Revere, Massachusetts (Community Panel Number 25025C0036J), the entire Site is located within a Zone AE (elevation 12 NAVD88) – *Special flood hazard areas (SFHA) subject to inundation by the 1% annual chance flood: (Base flood elevations determined*) (Appendix A, Figure 3).

The ORAD issued by the Commission confirmed that BLSF extends up to elevation 4.55 (NAVD 88) and elevations between 4.56 – 12 are considered LSCSF.

3. Wetland Resource Areas

As previously noted, the Revere Conservation Commission issued an ORAD (DEP File #061-0821) on June 10, 2024, confirming the boundaries of Bordering Vegetated Wetlands (BVWs), Bank/Mean Annual High Water (MAHW) Line to the ECD, the 200-

foot Riverfront Area, BLSF, and LSCSF in accordance with the *Act*, the *Act Regulations,* and the *Ordinance*, and non-bordering Freshwater Wetlands in accordance with the *Ordinance.*

The Revere High School Site occurs within BVW, a non-Bordering Freshwater Wetland (only protectable under the *Ordinance*), Bank, Riverfront Area, BLSF and LSCSF. Wetland Resource Areas are clearly depicted on the attached *Resource Area Graphics (Existing vs. Proposed)*, prepared by Nitsch Engineering, dated May 21, 2025 (Appendix D1). A description of these Wetland Resource Areas is provided below.

3.1 Bordering Vegetated Wetlands

BVW is defined in 310 CMR 10.55(2) as *freshwater wetlands which border on creeks, rivers, streams, ponds, and lakes. In these areas soils are saturated and/or inundated such that they support a predominance of wetland indicator plants. The boundary of BVW is the line within which 50% or more of the vegetational community consists of wetland indicator plants and saturated or inundated conditions exist.*

The A-series BVW fringes along the southern edge of the ECD, and a finger-like projection extending easterly from the ECD (wetland flags A1 - A13). The E-series BVW fringes along the northern edge of the ECD, expanding between the stream and Dunn Road (wetland flags E10 - E47). The fringing portions of the BVWs occur along the moderately steep embankments to the ECD and are primarily hydrologically influenced by the high groundwater table. A portion of the E-series BVW extends beyond the embankments north of the ECD within a topographic depression in the landscape. Large mounds of soil are present proximate to the paved/gravel portions of Dunn Road within and along the E-series BVW boundary.

Vegetation within the fringing BVW along the ECD and areas proximate to Dunn Road is dominated by common reed with scattered individuals of mature and sapling red maple, bebbs willow (*Salix bebbiana*), and pussy willow (*Salix discolor*). The shrub layer contains scattered individuals of elderberry (*Sambuscus canadensis*), highbush blueberry (*Vaccinium corymbosum*), and arrowwood (*Viburnum dentatum*). The groundcover layer includes patches of sensitive fern (*Onocleus sensibilis*), royal fern (*Osmunda regalis*), sphagnum moss (*Sphagnum* sp.), cattail (*Typha* sp.), various goldenrod, and poison ivy. Entanglements of multiflora rose, Asiatic bittersweet, and poison ivy are common throughout.

The A-series finger-like projection BVW within the eastern portion of the site lacks a canopy, sapling, and shrub layer, and is generally comprised of various grasses

(*Gramineae* spp.), soft rush (*Juncus effusus*), aster (*Aster* sp.), and goldenrod (*Solidago* sp.).

3.2 Non-Bordering Vegetated Wetlands

According to Section 1 of the *Ordinance*, any freshwater wetland is a jurisdictional area and includes non-bordering freshwater wetlands of any size.

The 1.9± acre B-series non-bordering Freshwater Wetland has developed within the interior of the former dog racetrack since the closing of Wonderland in 2010. The interior of the dog racetrack ranges between elevations 3 and 5, and is surrounded by the elevated track (el. 8), which essentially functions as a berm enclosing the majority of the interior. A series of subsurface stormwater and sewer drains, and remnants of a concrete structure/sidewalk cross each other beneath the non-bordering Freshwater Wetland.

Vegetation within the B-series non-bordering Freshwater Wetland consists of scattered individuals of mature and sapling bebbs willow, pussy willow, red maple, and silver maple. The shrub layer is comprised of scattered individuals of multiflora rose, elderberry, arrowwood, and highbush blueberry. The groundcover layer includes soft rush, sensitive fern, sphagnum moss, purple loosestrife (*Lythrum salicaria*), and various goldenrod and grasses (*Gramineae* spp.). Dense patches of common reed (*Phragmites australis*) and cattail (*Typha* sp.) occur within the central and northern portions of the wetland, with entanglements of common greenbrier (*Smilax rotundifolia*) and poison ivy common throughout.

3.3 Bank/Mean Annual High Water Line

Bank is defined at 310 CMR 10.54(2) as *the portion of the land surface which normally abuts and confines a water body. It occurs between a water body and a vegetated bordering wetland and adjacent flood plain, or, in the absence of these, it occurs between a water body and an upland. A Bank may be partially or totally vegetated, or it may be comprised of exposed soil, gravel or stone.*

Mean Annual High Water (MAHW) is defined at 310 CMR 10.58 (2)(a)(2) as *the line that is apparent from visible markings or changes in the character of soils or vegetation due to the prolonged presence of water and that distinguishes between predominantly aquatic and predominantly terrestrial land. Field indicators of bankfull conditions shall be used to determine the mean annual high-water line. Bankfull field indicators include but are not limited to; changes in slope, changes in vegetation, stain lines, top of pointbars, changes in bank materials, or bank undercuts.*

The perennial stream is a tributary to Diamond Creek, located within the Rumney Marsh Reservation approximately 1/2 mile north of the Site. A series of road crossings and culverts occur between the Site and Diamond Creek, and a tide gate is present beneath the elevated Rockport/Newburyport Commuter railbed within the Rumney Marsh Reservation, west of North Shore Road (Route 1A).

The ECD is contained within linear, moderately steep embankments with two paved crossings. The northern crossing is located atop a 54-inch diameter corrugated metal culvert, and the southern crossing is a wooden bridge spanning the ECD. At the northeastern property boundary, the ECD flows off-site via two 30-inch diameter culverts. These culverts extend off-site with multiple twists and turns beneath the residential neighborhood to the north and North Shore Road, daylighting 700± linear feet northeast of the site, north of the Wonderland MBTA surface parking lot. The ECD continues flowing off-site, ultimately discharging to Diamond Creek and the Pines River.

A 36" reinforced concrete pipe (RCP) within a 10-foot-wide drainage easement directs off-site stormwater from south of the Site beneath the former dog racetrack and into the ECD (proximate to flag 1-55). Additional stormwater discharges into the ECD include the Dunn Road pump station and three (3) stormwater outfalls directing on-site stormwater into the ECD.

3.4 Land Under Waterbodies and Waterways

Land Under Waterbodies and Waterways (LUWW) is defined at 310 CMR 10.56(2) as *the land beneath any creek, river, stream, pond or lake. Said land may be composed of organic muck or peat, fine sediments, rocks or bedrock. The boundary of Land under Water Bodies and Waterways is the mean annual low water level.*

LUWW occurs below the Bank boundary associated with the ECD. LUWW is comprised of muck and a dense monoculture of common reed. The proposed project does not include impacts to LUWW.

3.5 Riverfront Area

Riverfront Area is defined at 310 CMR 10.58 (2)(a)(3) as *the area of land between a river's mean annual high-water line measured horizontally outward from the river and a parallel line located 200 feet away.*

Riverfront Area extends 200 feet horizontally from the Bank/MAHW Line associated with the ECD. Riverfront Area south of ECD predominantly consists of pavement within 1 to 5 feet from the Bank/MAHW Line and qualifies as Previously Developed and

Degraded Riverfront Area. Riverfront Area north of ECD contains areas of pavement, gravel, BVW, forested upland, and manicured lawn. Only the pavement north of the ECD qualifies as Previously Developed and Degraded Riverfront Area. The attached *Resource Area Graphic*, prepared by Nitsch (Appendix D1, Fig-3 and Fig-6) depicts the existing and proposed conditions within Riverfront Area.

3.5 Bordering Land Subject to Flooding/Land Subject to Coastal Storm Flowage

BLSF is defined at 310 CMR 10.57(2)(a) as *the estimated maximum lateral extent of flood water which will theoretically result from the statistical 100-year frequency storm. Said boundary shall be that determined by reference to the most recently available flood profile data prepared for the community within which the work is proposed under the National Flood Insurance Program (NFIP, currently administered by the Federal Emergency Management Agency, successor to the U.S. Department of Housing and Urban Development). Said boundary, so determined, shall be presumed accurate.*

LSCSF is defined at 310 CMR 10.04 as *land subject to any inundation caused by coastal storms up to and including that caused by the 100-year storm, surge of record or storm of record, whichever is greater.*

The ORAD issued by the Commission confirmed that BLSF extends up to elevation is 4.55 (NAVD 88) and elevations between 4.56 – 12 are considered LSCSF. The ORAD also confirmed that the interior of the former dog racetrack is not protectable as Isolated Land Subject to Flooding.

4. Proposed Project

The Applicant proposes to removal of vegetation and expansive areas of pavement, and construction of Revere High School including a new four-story, podium style, 422,500± gross square foot building with ground level parking; internal paved driveways; paved parking lots; synthetic turf athletic fields and tennis courts; stormwater management infrastructure; outdoor classrooms; grading; extensive native plantings; and remediation of hazardous materials identified through the MCP. The proposed project will reduce 7.14± acres of impervious area on the Site, improve stormwater management treatment through implementation of stormwater BMPs, and provide 12.84± acres of public open space. The proposed site conditions are graphically depicted on the *Color Rendered Site Plan* (Appendix B).

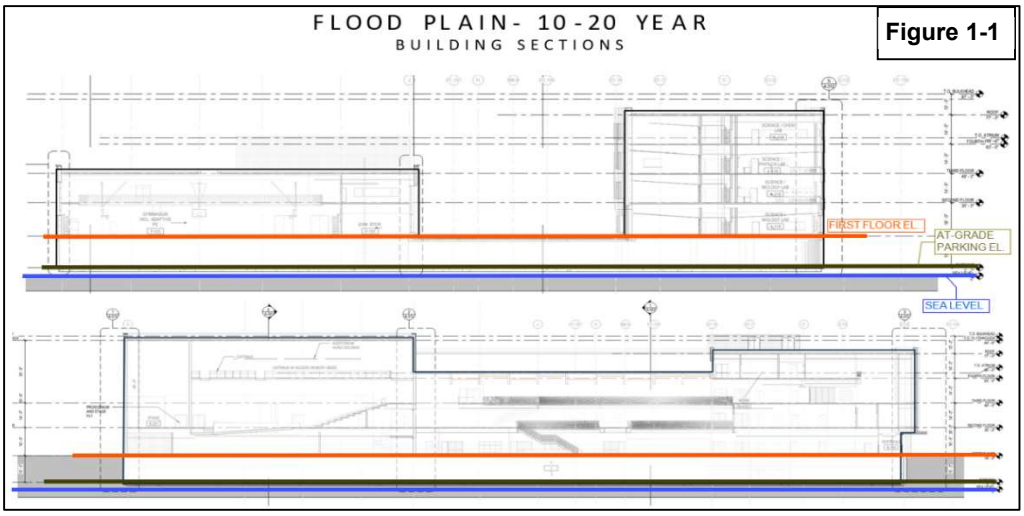
The proposed project will result in temporary and permanent disturbances to Wetland Resource Areas, as further described in Section 6.

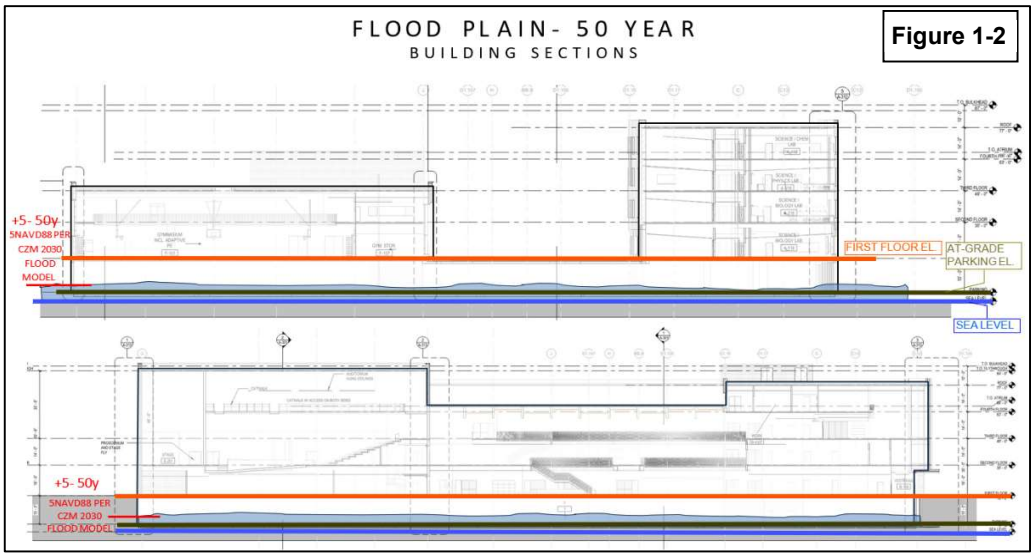
4.1 Revere High School Building

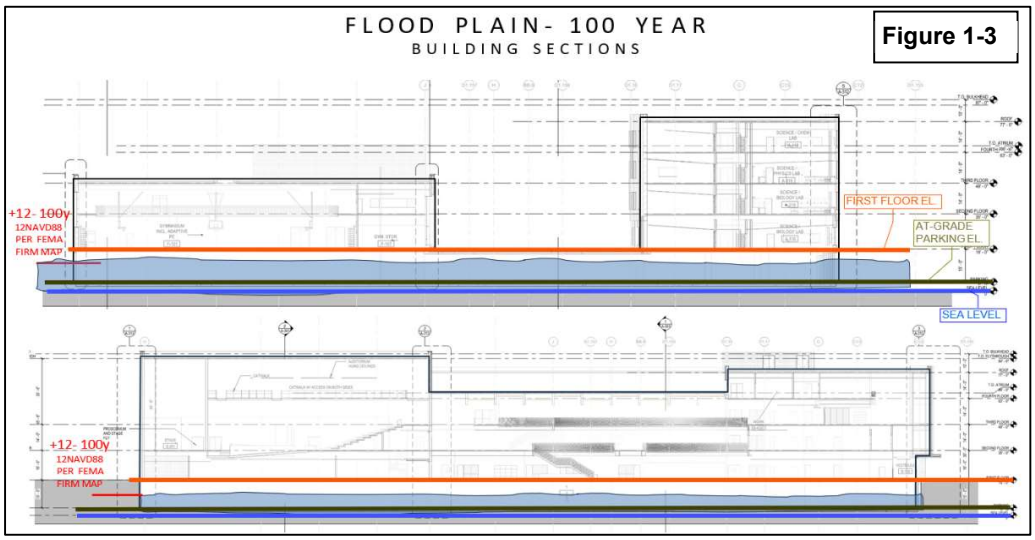
The Applicant proposes to construct a new four-story, 422,500 gross square foot building serving grades 9 through 12 within the southern portion of the Site. The overall school design is primarily based on educational programming and is intended to achieve the standards and sizes necessary to meet educational needs of students and faculty.

The building is organized around a central three-story "Heart of the School," comprised of a main entry hall and staff offices. Two four-story Academic Wings to the south, and a two-story Health and Wellness Wing and Performing Arts Wing to the north radiate from the Heart of the School. These academic wings are positioned for effective solar orientation. The podium-style building will be constructed with a base occupancy elevation 15 feet above 345 at-grade parking spaces beneath the podium style building. The finished floor elevation of the first story will be set at elevation 19, 7 feet above the current 100-year floodplain elevation (el. 12 NAVD 88), and 5 feet above the average projected 2070, 200-year Sea Level Rise (SLR)/Storm Surge elevation in this portion of the Site (average el. 14 NAVD 88). The proposed building exceeds compliance with state and local building codes for construction in the floodplain and has been designed with consideration to projected sea level rise and storm events.

At grade parking underneath the podium style building is at elevation 4 NAVD88 and allows floodwater during more significant storm events to flow beneath the building in route to the ECD (See Figures 1-1 through 1-3 below).







The school is being designed as Net-Zero Ready, Fossil Fuel Free, and will achieve Passive House standards for energy efficiency. Highly efficient triple pane windows, insulation, and a white reflective roof are proposed to achieve energy efficiency. Additionally, geothermal wells are proposed to provide a renewable energy source to heat and cool the school building. The subsurface geothermal wells will be installed beneath the athletic field located closest to the building, as depicted on Sheet C-504 of the *Plan* (Attachment J).

A number of Site constraints and design considerations directly influenced and contributed towards the design and architectural character of the proposed building. These site constraints include the presence of the ECD and associated BVW bifurcating the site, and the 100-year floodplain (BLSF and LSCSF). With these constraints in mind, the building has been specifically situated in the southwestern most portion of the Site where the existing elevation is highest. Associated developed areas have been sited

southeast of ECD primarily within existing paved portions of the Site to utilize opportunities to improve degraded areas and reduce impervious area.

The proposed building will result in permanent impacts to the non-bordering Freshwater Wetland and is located within BLSF, LSCSF, Riverfront Area, and the 100-foot Buffer Zone.

4.2 Site Access, Parking, and Transportation

Access to Revere High School will be provided via two (2) new access driveways, one located on North Shore Road directly across from the MBTA Wonderland Station driveway and the other on VFW Parkway directly across from the Wonderland Marketplace Driveway. The VFW Parkway driveway entrance will be the fourth leg of the existing 3-way intersection. The North Shore Road driveway entrance will re-purpose an existing entrance and update existing traffic signals, as needed. The existing Butler Circle entrance will be removed/discontinued. A shared-use path is proposed along the site frontage to VFW Parkway and North Shore Road, encouraging and providing safe access to alternative modes of transportation. The Applicants traffic engineer, VHB, has been coordinating closely with the Massachusetts Department of Transportation (MassDOT) during the project design and will obtain the appropriate MassDOT permits for site access.

In the event that emergency access is not available from the VFW Parkway or North Shore Road, an access driveway is proposed to extend from the existing terminus of Dunn Road, within the Dunn Road right-of-way, up to the southerly existing paved ECD crossing. No repaving or improvements to this crossing will occur. The second, northerly crossing of the ECD will be used for a 15-foot-wide pedestrian only sidewalk extending from Dunn Road through the upland meadow and over the existing paved stream crossing. This sidewalk is wide enough to accommodate emergency vehicle access, although it is not intended for vehicular use. Fifteen feet width of existing pavement at the crossing will be removed by hand and re-paved by hand, and wooden guardrails will be installed on each side for public safety. These proposed improvements to accommodate access do not require widening or improvements to these existing crossings.

Internal driveways loop around the school with proposed athletic fields within the northern portion of the Site. A dedicated bus drop-off area is located at the southern entrance to the building and dedicated passenger vehicle drop-off is located at the eastern building entrance. The proposed project includes 345 at-grade parking spaces beneath

the podium style building. Six paved parking lots are proposed proximate to the school building and/or proposed athletic fields and tennis courts providing an additional 332 parking spaces for a total of 677 parking spaces. As depicted on Sheets C-703 through C-705 of the *Plan* (Attachment J), 14 Electric Vehicle (EV) charging stations are proposed within the southern parking lot proximate to the proposed tennis courts, and 12 EV charging stations are proposed at the site entrance parking lot. Additionally, 11 EV elevated charging stations are proposed within the at-grade parking garage, providing a total of 73 EV charging spaces. The project also includes 67 EV ready parking spots, encouraging and supporting an alternative to gas-powered vehicles. Details of the EV charging stations are provided on Sheet L405 of the *Plan*.

Concrete, ADA/AAB accessible sidewalks are incorporated throughout the Site to provide direct access to the school, surrounding athletic fields, and outdoor amenities. Bike racks and scooter parking areas are provided in close proximity to the building and at the building entrances, as depicted on Sheets L111 – L113 of the *Plan* (Attachment J).

Proposed driveways, parking lots, and sidewalks are located within BLSF, LSCSF, Riverfront Area, and the 100-foot Buffer Zone. The proposed conditions will result in a net reduction of 7.14± acres of impervious area throughout the Site.

4.3 Open Space and Athletic Fields

Outdoor Classrooms and Hardscapes

The proposed project includes a robust planting design throughout the Site, and ample outdoor space available to students and the general public for education and passive recreation. The open space will incorporate deciduous shade trees, evergreen trees, shrubs, native flowering perennials, and native herbaceous mixes further described in Section 4.4.

A healing garden, outdoor classrooms, micro-forest, large courtyard, seating areas, and concrete walking paths are proposed around the school building (Appendix B). The Outdoor Natural Classroom proposed west of the ECD includes meandering stone mulch (with stabilizing binder, detail on Sheet L520 of the *Plan*, Attachment J) walking paths and wood bridges (both 6-foot-wide), and will be vegetated with a mix of deciduous and evergreen trees, shrubs, herbaceous mixes, and perennial herbaceous plugs. The central portion of this outdoor classroom will be graded to provide compensatory storage, as further described in Section 6.1.4.

A wide array of seating types are incorporated to accommodate a diverse group of users and activities. Seating throughout the Site includes curved wooden benches, standard

wooden benches, natural stone benches, and amphitheater seats. Additional public amenities include access to community spaces within the building, bike racks, scooter parking, trash and recycling receptacles, and 7.14± acres of existing impervious areas to be converted from pavement to vegetated areas.

Outdoor Sports Program

Two synthetic turf athletic fields with spectator seating are located within the northeastern portion of the Site. Grass fields were eliminated from consideration as they require rest periods between uses and are unable to be used immediately after rain events. Synthetic turf multisport fields allow near constant use without requiring any downtime, even in wet conditions, allowing for use by the high school and additional city-wide recreational programs. The maintenance program for synthetic turf requires no irrigation, no fertilizers, no mowing, and no pesticides. Synthetic turf is a permeable surface and therefore water does move directly through the surface material into an open graded stone sub-base and then to a subsurface drainage system, as further described in Section 5.2. The synthetic turf field infill proposed above the sub-base is an acrylic coated silica sand that is a dense infill product and since it does not float, is unlikely to migrate in flood conditions. Details of the synthetic turf field are provided on Sheets L202, L204, L302, L304, and L402 of the *Plan* (Attachment J).

As part of the overall compensatory flood strategy for the Site grading, the multisport synthetic turf fields are positioned at elevation 3-4± NAVD 88 and are anticipated to flood in a 100-year storm event, as they are located below the 100-year floodplain (el. 11-12 NAVD 88). In the event of a flood, synthetic turf fields can be brought back online with only minimal clean-up. In comparison, natural grass could sustain damage from flood waters that could destroy the grass and require substantial repair work and downtime to restore the fields for use.

Five tennis courts are located within the southern portion of the Site, south of the building (Sheet L205, Attachment J). The tennis courts will be comprised of 3-inch-thick asphalt with acrylic sand color seal coat, and enclosed with a 10-foot-tall chain-linked fence and windscreen.

The proposed tennis courts are located entirely within LSCSF, and partially within the non-bordering Freshwater Wetland and associated 100-foot Buffer Zone. The proposed synthetic turf fields are located entirely within BLSF and partially within Riverfront Area and the 100-foot Buffer Zone to BVW.

4.4 Site Grading and Landscaping

Grading

The proposed design prioritizes limiting impervious areas by minimizing roadway widths and maximizing landscaped and revegetated areas while maintaining required design standards for transportation and accessibility. The project has been carefully designed and graded to construct the building, surrounding hardscape areas, landscaping, and accessways to either match existing grades or lower existing grades to the extent practicable. Details of the proposed grading are depicted on Sheets C-600 through C-606 of the *Plan* (Attachment J). Due to the presence of the 100-year floodplain across the entire Site, careful and creative design was considered to make the best and most practical use of the space while respecting the potential flooding and flow paths. The portions of the Site in BLSF (areas up to el. 4.55) have been calculated on a foot-by-foot basis to increase the existing flood storage, when possible, as depicted on the *Compensatory Flood Storage Graphic* (Appendix E). In addition to careful consideration of site grading and floodplain characteristics, the design also will avoid redirecting flow paths, exacerbating flooding, and/or directly increasing the volume of flooding directed to off-site properties, as depicted on the *Floodplain Progression/Recession Graphic* (Appendix D4).

The courtyard immediately south of the building will be comprised of hardscape pathways with tree and shrub plantings. Proposed slopes will descend in a southerly direction from elevation 19 (NAVD 88) to elevation 5 within the southern portion of the Site. Minimal retaining walls will be required to accommodate this topographic transition (i.e., reducing proposed impervious features), and handrails and security fencing are proposed where required for necessary safety measures.

Landscaping

The school building and hardscape areas will be surrounded by landscaping and include primarily native, native cultivars, and naturalized deciduous shade trees, shrubs, and flowering perennials. Landscape plantings and trees are located along all roadways, and within and around parking areas, plazas, and walkways. The variety of flowering and fruit/nut producing landscape plantings will provide opportunities for pollinators and wildlife, encouraging biodiversity, food sources, and habitat.

The existing lawn to the west of the ECD will be regraded and revegetated to function as a Natural Outdoor Classroom (also functioning partially as compensatory storage). Regrading the area will create tiers of habitat types within a landscape currently only providing meadow and sapling layers. Details of the proposed plantings specifically

within the Natural Outdoor Classroom are provided in Sheet L310 of the *Plan* (Attachment J).

A total of 670 trees are proposed in the combined *Landscaping Plan* (Attachment J) including a mix of deciduous and evergreen trees. This is a significant increase in tree cover and will replace existing non-native, invasive trees with native, native cultivars, and naturalized tree species. In addition, 355 large shrubs also are proposed.

A unique planting opportunity is proposed near the building to encourage dense and naturalized vegetative cover. A 2,100± square foot micro-forest is proposed on the north side of the northern educational wing (Attachment J Sheet L312). Juvenile trees will be planted at dense spacing in an area and left to revegetate naturally with limited maintenance aside from removal of colonizing invasive species by hand. This micro-forest will support essential ecological functions such as carbon sequestration, biodiversity enhancement, and soil health improvement. The micro-forest also serves as a valuable educational resource for students and the community.

Five different herbaceous planting mixes are proposed in different areas throughout the Project Site, including a Meadow Mix A, (33,100 sf), Meadow Mix B (36,700 sf), Rain Garden Mix (500 sf), Aquatic Mix (4,000 sf), and Island Mix (250 sf), covering 74,550 square feet (1.71 acres) of land to be revegetated specifically with groundcover. Additionally, seven different woody species/herbaceous planting mixes are proposed, including a Shrub Wetland Mix (2,100 sf), Savanah Mix (9,200 sf), Forested Upland Mix A (44,300 sf), Forested Upland Mix B (12,000 sf), Forested Upland Mix C (8,100 sf), and Forested Upland Mix D (3,500 sf), covering 79,200 square feet (1.81 acres) of land to be revegetated with a mix of woody and herbaceous planting mix. Additionally, 57,023 perennial grass plugs are proposed.

Sheets L301 & L316 of the *Plan* (Attachment J) detail the full plant schedules, and Sheets L301-L306 and L310-L315 of the *Plan* detail the full planting plans.

4.5 Sanitary Sewer, Water, and Electric

The proposed project will remove existing abandoned sewer and drainage utilities, and relocate or replace active sewer and drainage utilities that are in poor condition or require relocation to accommodate the proposed construction and stormwater management features. New water lines will be installed as a looped system to tie into existing water mains within rights-of-way (ROWs) adjacent to the Site. Demolition and removal of existing utilities is detailed on Sheets C-301 through C-306 of the *Plan* (Attachment J)

and proposed utilities are depicted on Sheets C-501 through C-506, and Sheet C-510 of the *Plan.*

Existing 24- to 30-inch sewer mains with accompanying 10-foot-wide easements direct offsite sewer flows through the Site. To accommodate the proposed building pad, the sewer mains require rerouting around the exterior of the building. The existing sewer mains will be resized and rerouted around the perimeter of the proposed building, continuing to convey the existing flows and supporting additional flows generated from the high school. A proposed sewer line will connect the school to the existing sewer mains via three doghouse manholes. All structures and sewer pipes are below the BLSF elevation 4.55 and will be specified and detailed to be water-tight (Attachment J, Sheets C-301 – C-306 and C-501 – C-506).

In addition to the sewer reroute, a 15,000-gallon grease trap will be required to handle kitchen waste and is located near the loading dock at the northern edge of the Site. The proposed irrigation tank, located in the building's courtyard, will be installed *above* the BLSF elevation 4.55, but *beneath* the LSCSF. The loading dock supporting the new school, including transformers and generators, is elevated above the LSCSF, at approximately elevation 18. Utility infrastructure onsite will be specified and detailed to be water-tight (Attachment J, Sheets C-501 – C-506 and C-950 – -951).

An existing 8-inch water line is located along the curb line of the project bordering the VFW Parkway. A proposed 10-inch water loop around the building will branch off the existing 8-inch water line to support the new high school. One 6-inch fire protection line and one 8-inch domestic water line will exit the building on the northern edge of the building and connect into the 10-inch water loop. Proposed hydrants are required within 100 feet of fire department connections (FDCs). All new service connections shall be in accordance with the City Specifications (Attachment J, Sheets C-501 – C-506 and C-950 – 951).

4.6 Remediation Activities

A Release Tracking Number (RTN) identified during environmental due diligence activities performed by the prior property owner is located west of the ECD (Appendix C). This RTN is in addition to the RTN 3-30722 identified within the Phase One Limit of Disturbance, which was permitted through the Order of Conditions (OOC #061-0835) issued by the Revere Conservation Commission on February 20, 2025. The RTN located within the western portion of the Site (RTN 3-30721) was assigned by MassDEP due to the presence of fluorene in groundwater at a concentration above the RCGW-2

Reportable Concentration in a monitoring well located in a tenant yard in the western portion of the Site. The Licensed Site Professional (LSP), Sanborn Head, collected soil samples in 2024 and 2025 and submitted to Pace Analytical Services (Pace) of Westborough, Massachusetts for laboratory analysis of extractable petroleum hydrocarbon (EPH) fractions with target polycyclic aromatic hydrocarbons (PAHs), volatile petroleum hydrocarbon (VPH) fractions with target VOCs, and/or total lead. Sanborn Head detected PAHs in three of the four samples collected in the former tenant yard (RTN 3-30721).

Monitoring results suggest that the concentrations are within an approximately 29,500 sf area. Excavation depth is anticipated to be shallow, as impacts were generally observed within the top 5 feet of the soil profile during monitoring. Assuming a uniform excavation to five feet below the ground surface, the anticipated volume of soil excavation is approximately 5,500 cubic yards.

The approximately 29,500 square foot remedial soil excavation will be performed under a Release Abatement Measure (RAM) Plan that will be submitted to MassDEP by Sanborn Head. The LSP is currently refining the work area and remediation activities are anticipated to only occur within the Limit of Work (LOW) of the proposed project, resulting in impacts to Riverfront Area, BLSF, and LSCSF. The RAM Plan will describe the areas and anticipated depths of excavation and provide the procedures that will be followed for soil management, excavation dewatering, and air monitoring that will be performed during the remedial soil excavation activities. The excavation contractor will operate under a Site-Specific Health and Safety Plan (HASP) and will utilize appropriately trained hazardous waste personnel in accordance with the Occupational Safety and Health Administration (OSHA) regulations. Work zone air monitoring will be performed to monitor worker safety in accordance with the HASP. In addition, perimeter dust monitoring will be performed to monitor dust concentrations at the fence line. The RAM Plan will establish a dust action level for the remedial soil excavation that will be based on a risk assessment for fence line sensitive receptors. Dust levels at the fence line will be monitored to ensure that dust levels remain below the action levels. Dust suppression methods such as spraying water will also be performed as needed during construction to keep dust levels below the action level.

Based on the soil and groundwater data collected and the proposed remediation to be performed during construction, vapor intrusion is not considered to be a likely pathway for the future building occupants. The primary contaminant of concern, flourene, is

considered non-volatile. Therefore, a sub-slab venting system to mitigate potential vapor intrusion from the subsurface is not anticipated to be necessary for the future building.

The objective of the remediation is to remove contaminated soil such that a condition of No Significant Risk is achieved for future use of the Site as a high school. Sanborn Head anticipates that Permanent Solutions will be filed to signify regulatory closure of the RTN after construction is complete. The Permanent Solutions will be supported by MCP Risk Characterizations that demonstrate that a condition of No Significant Risk to human health, safety, public welfare, and the environment has been achieved for use as a high school.

The Applicant is open to a Special Condition in the Order of Conditions requiring the LSP to provide a copy of the RAM Plan and subsequent RAM Status Reports to the Commission until remediation is complete, at which time a RAM Completion Report will be provided.

5. Mitigation Measures

The Applicant intends to implement the following mitigation measures as part of the proposed project.

5.1 Erosion and Sedimentation Control

The Applicant proposes to implement an erosion and sedimentation control program to protect the Wetland Resource Areas and adjacent properties from sedimentation during the site preparation and construction activities. This plan is based on MassDEP guidelines and erosion and sedimentation controls will be installed, along with catch basin inlet protection, as depicted on Sheet C-920 of the *Plan*. A stabilized construction entrance comprised of crushed stone atop filter fabric will be installed at the Butler Circle entrance to minimize transport of dust and sediment from the Site (Sheets C-204-EN and C-920 of the *Plan*).

The erosion and sedimentation control program will be implemented in accordance with a Stormwater Pollution Prevention Plan (SWPPP) and the EPA NPDES Construction General Permit (CGP), and all erosion controls will remain in place until disturbed areas are stabilized with pavement or vegetation. The Applicant will provide the final SWPPP to the Commission prior to start of construction.

The project is considered redevelopment and will be conducted in compliance with the DEP Stormwater Management Regulations, to the maximum extent practicable, as

detailed in the *Stormwater Report* containing the DEP Stormwater Checklist, Illicit Discharge Compliance Statement, and O&M Checklist, and, prepared by Nitsch Engineering, dated May 21, 2025 (Attachment I). All erosion control measures will be routinely inspected and repaired, as needed, and will remain in place until work is complete, and all disturbed areas are stabilized. The erosion and sedimentation control program will be implemented in accordance with a SWPPP and the EPA NPDES CGP. The location of the proposed erosion controls and details are shown on Sheet C-100 and C-201 through C-206 of the *Plan* (Attachment J).

All stockpiles will be inspected at least weekly by the engineer until the site reaches final stabilization, in accordance with the SWPPP and the EPA CGP, and inspections of these measures will be conducted by the Contractor on an ongoing basis during construction.

All excavated materials will be stockpiled within the LOW and encompassed with erosion and sedimentation controls to reduce the risk of erosion and sedimentation into the ECD and associated BVWs. Limited stockpiling of contaminated soils since direct loading of trucks is anticipated. However, temporary staging of contaminated soil may be necessary due to truck sequencing and schedules. In the event this occurs, contaminated soil will be stockpiled on polyethylene sheeting or other impervious surfaces and covered or stabilized when not actively being used.

5.2 Stormwater Management

The Stormwater Management System is designed to include structural BMPs in compliance with the DEP's Stormwater Management Handbook and the Performance Standards at 310 CMR 10.05 (6) (k). As a redevelopment, the proposed project is required to meet the MassDEP Stormwater Management Standards to the maximum extent practicable. The stormwater management objective for the site is to mitigate any increase in peak storm runoff rates while improving water quality and resiliency. The existing Site currently encompasses over 21.75± acres of impervious area with no existing stormwater controls to address either quality or quantity of stormwater runoff from the Site. As proposed, impervious surface will *decrease* by 7.14± acres. Details of the proposed stormwater management system are provided on Sheets C-401 through C-407, and Sheet C-420 of the *Plan* (Attachment J).

Stormwater calculations, a detailed drainage analysis, and a summary of the proposed project's compliance with the applicable stormwater standards are contained within the *Stormwater Report* (Attachment I). The stormwater management system design prevents the excess generation of stormwater and non-point source pollution by greatly reducing

impervious surfaces, disconnecting flow paths, treating stormwater at its source, and protecting natural processes. Direct infiltration is not a feasible design option due to the high groundwater elevations documented within the Site. Notably, Nitsch consulted the Resilient Massachusetts Action Team (RMAT) Climate Resilience Design Standards Tool to utilize recommended design standards through design of the stormwater management system. The RMAT Tool recommends a 2070, 50-year (2%) 24-hour precipitation depth of 9.5 inches. Table 1 below depicts the peak runoff rates and runoff volumes of stormwater projected using the 2070, 50-year design storm:

Table 1: 2070 Peak Rates and Volumes of Runoff in Cubic Feet per Second (cfs/cf)

	Storm Event	2070, 50-Year Storm
Total Site Peak Rates	Existing	284.56 cfs
	Proposed	147.63 cfs
Total Site Volumes	Existing	1,063,724 cf
	Proposed	998,572 cf

The proposed stormwater management system has been designed so there is no increase overall in post construction discharge rates from the Site. The stormwater design used the NOAA Atlas 14, Volume 10, Version 3 precipitation frequencies, intensity, and duration for 24-hr rainfall depths for the 2-year, 10-year, 25-year, and 100-year storms in designing, and sizing the stormwater systems. Climate change projections indicate that rainfall volumes will continue to increase. The NOAA Atlas 14 helps account for these changes as the NOAA Atlas 14 models the increased rainfall intensities.

The proposed stormwater management system will utilize deep-sump and hooded catch basins, water quality swales, proprietary filtration systems, and proprietary water quality structures. Stormwater from the Site will be captured and routed to six outfalls along the ECD. Two of the outfalls maintain the existing outfall patterns to the ECD (Outfalls 1 and 3). Four new outfalls will be constructed along the ECD through the addition of headwalls and supporting grading. All outfalls to the ECD will include riprap to minimize concentrated flow and prevent scour into the ditch. The outfalls will result in temporary impacts to BVW and Bank, as further described in Sections 6.1.2 and 6.1.3 and depicted on the *Outfall Graphic* (Appendix D3).

The stormwater management system will not discharge untreated stormwater into, or cause erosion to, wetlands or waterways; will not result in a loss of annual recharge to groundwater; implements BMPs to remove greater than 80% Total Suspended Solids; contains Land Uses with Higher Potential Pollutant Loads and as such, the water quality structures used to manage these areas are sized to treat the 1-inch water quality storm; is

not located within critical areas; and will not result in illicit discharges. The *Stormwater Report* (Attachment I), prepared by Nitsch Engineering, dated May 21, 2025, includes the MassDEP Stormwater Checklist, stormwater management and drainage analysis, Long-Term Pollution Prevention and Stormwater O&M Plan, a Draft SWPPP, and an Illicit Discharge Compliance Statement.

5.3 Restoration Areas

To facilitate installation of the stormwater outfalls (i.e. construction work footprint and grading), the project involves approximately 226± square feet of temporary BVW disturbance and 92± linear feet of temporary/permanent Bank disturbance. Erosion controls will be installed at the limit of work prior to construction and will be routinely inspected and maintained during construction in accordance with the SWPPP. The temporary disturbances to BVW and Bank will be restored by removing any accumulated material (i.e., gravel, loam, etc.) and placing approximately 12 inches of organic rich topsoil with a finish elevation that matches existing conditions in the adjacent BVW. Vegetation will be re-established by installing herbaceous plugs included in the aquatic mix (Sheet L316 of the *Plan*, Attachment J). Prior to planting installation, a biodegradable coir mat will be placed to minimize erosion and/or sedimentation during germination, as depicted on Sheet C-920 of the *Plan*.

Temporarily disturbed areas within the 100-foot Buffer Zone will be mitigated via a reduction in impervious area and implementation of the planting plan depicted on the L-series Sheets of the *Plan* (Attachment J). The 100-foot Buffer Zone associated with the BVW is also entirely within the 200-foot Riverfront Area. Portions of the proposed building, paved parking lots, landscaping, and the Outdoor Natural Classroom are proposed within 'Undeveloped' and 'Previously Developed' Riverfront Area. The 'Undeveloped' Riverfront Area is characterized as naturalized uplands containing meadow and sapling/shrub vegetation west of the ECD. Roughly 109,847 square feet of this meadow edge will be regraded and revegetated with native, native cultivars, and naturalized deciduous shade trees, shrubs, and flowering perennials to create the Outdoor Natural Classroom and compensatory storage.

'Previously Developed' Riverfront Area includes the footprint of the former dog racetrack, gravel areas, and pavement. The gravel areas and pavement are considered 'Degraded' in accordance with 310 CMR 10.58 (5). Roughly 311,408 square feet of 'Previously Developed' Riverfront Area will be altered to accommodate the proposed project. Of the 311,408± square feet of 'Previously Developed' Riverfront Area to be altered, 302,139± square feet qualify as 'Degraded.'

As part of the landscaping effort described above in Section 4.4, 51,013± square feet of Riverfront Area will be restored by reducing impervious area and restoring with vegetation, as depicted on the L-series Sheets in the *Plan* (Attachment J). The conversion of naturalized meadow and sapling/shrub vegetation to the Outdoor Natural Classroom is essentially a conversion of landscape and will result in an increase in vegetative diversity and habitat types that maintains or improves Riverfront Area function and value. Additionally, invasive species including common reed, Japanese knotweed, multiflora rose, Asiatic bittersweet, Tatarian honeysuckle, and common buckthorn occur within this area and will be removed as a result. The planting plan, implementing a diverse mix of native, native cultivar, and naturalized trees, shrubs, and perennials, has been carefully designed to select species that can withstand environmental stresses such as drought and disease. The proposed conditions and planting plan will result in a net decrease of impervious area and increase in vegetated areas both within the Riverfront Area and within the entirety of Site (7.14± acre net decrease in impervious).

LEC will coordinate with the project team to supervise the restoration effort. Monitoring reports will be submitted to the Commission following the of completion of construction of the restoration, and at the end of the first and second full growing seasons after construction (prior to December 15 of the monitoring year), or until 75% of the restoration areas are covered with vegetation. The monitoring reports will provide data on the species composition of plants within the restoration areas, their relative abundance, representative site photographs, and the percentage of any invasive species. The report will make recommendations for additional plantings should the wetland scientist deem it necessary due to plant mortality, and recommendations for removal of invasive species, if present.

5.4 Invasive Species Removal

Under current conditions, the Site contains dense stands of common reed, patches of Japanese knotweed, Asiatic bittersweet, common buckthorn, autumn olive, Tatarian honeysuckle, and multiflora rose within developed areas (i.e. cracks in the pavement), the B-series non-Bordering Vegetated Wetland, the A/E-series BVW, and/or in vegetated areas upgradient of Bank to the ECD. The proposed project will result in removal of the aforementioned rapidly colonizing invasive, non-native species within the LOW.

Considering the extensive amount of common reed within the ECD and proximate to the wetland restoration and compensatory storage area, LEC has prepared an Invasive Species Management Plan (*ISMP*, Appendix F) to guide the Contractor in preparing a site-specific ISMP to implement during construction. The *ISMP* also includes guidance

to implement during post-construction monitoring activities, including monitoring protocols and management/removal options to recommend to the City of Revere.

5.5 Additional Mitigation

As noted above, proposed remediation will remove contaminated soils from the Site and reduce potential health risks. The RAM Plan will be developed to excavate, remove, and properly dispose of contaminated soils, leaving the Site in a condition of No Significant Risk to human health, safety, public welfare, and the environment. Regardless of the anticipated Site development, remediation of contaminated soils will result in an overall benefit to the Site and surrounding areas.

As discussed at the August 6, 2024 Revere Conservation Commission meeting, the proposed project incorporates the following environmentally related mitigation in addition to what has been described in Sections 5.1 through 5.4:

- Building will achieve PHIUS standards for energy efficiency.
  - White reflective roof membrane.
  - Roof designed to be solar ready.
  - Geothermal heating and cooling (Sheets C-502 through C-504 of the *Plan*).
- 37 EV charging stations provided for 73 parking spaces, plus 67 EV ready spaces (Sheets C-703 through C705 of the *Plan*).
- Internal features (i.e. bike paths and ADA/AAB compliant sidewalks) with direct connections to the Wonderland MBTA Blue Line and Bus Station encouraging subway, bus and bicycle transit, and pedestrian access, resulting in a reduction to the sites carbon footprint.
- Impervious area reduction of 7.14± acres, approximately 5.14± acres ***more*** than originally discussed with the Commission.
- Native, native cultivars, and naturalized plantings improving biodiversity and reducing heat island affect around the building and parking areas, and along the roadways as depicted on L-Series Sheets of the *Plan* at Attachment J.
- Wildlife/environmental education for students and residents.
  - Educational signage throughout the property (to be provided in a revised *Plan*).
  - Wellness/walking paths throughout the property.
  - Outdoor Natural Classroom (also functioning partially as compensatory storage) with walking paths and boardwalk (Sheets L210 and L310 of the *Plan*, Attachment J).
  - A micro-forest (Sheets L211 and L311 of the *Plan*, Attachment J).

- Permanent markers along edge of development to prevent future encroachment into Wetland Resource Areas (to be provided in a revised *Plan*).

- Wildlife habitat improvement.
  - Native, native cultivars, and naturalized vegetation integrated into landscaped areas and outdoor classrooms.
  - Installing an Osprey nest platform within the Outdoor Natural Classroom (Attachment J, Sheet L110) and improvements to and/or creation of additional, diverse meadow habitat.

6. Regulatory Compliance

The project has been designed to achieve compliance with the applicable performance standards set forth in the *Act*. There are no specific performance standards in the *Act* for work within LSCSF and there are no specific performance standards in the *Ordinance*. However, the *Ordinance* does protect non-bordering Freshwater Wetlands and as such, compliance for work within this resource under the *Ordinance* is provided in Section 6.2 below. Table 2 below summarizes temporary and permanent impacts to Wetland Resource Areas.

Table 2: Wetland Resource Area Impacts

Wetland Resource Area	Temporary Impacts	Permanent Impacts	Regulatory Reference
Bank	72± lf	20± lf	310 CMR 10.54, *Ordinance*
BVW	226± sf	0± sf	310 CMR 10.55, *Ordinance*
Riverfront Area	0± sf	421,255± sf	310 CMR 10.58, *Ordinance*
BLSF	0± sf	776,259± sf	310 CMR 10.57, *Ordinance*
LSCSF	0± sf	1,459,234± sf	310 CMR 10.02, *Ordinance*
Non-bordering Freshwater Wetland	0± sf	82,771± sf	*Ordinance*

6.1 Massachusetts Wetlands Protection Act Regulations

6.1.1 Limited Project Status

6.1.1.1 **Remediation**

The proposed remediation work will occur within LSCSF, BLSF, Riverfront Area, and the 100-foot Buffer Zone within the LOW identified in the *Plan*. In accordance with 310 CMR 10.53(3)(q) which states: "Assessment, monitoring, containment, mitigation, and remediation of, or other response to, a release or threat of release of oil and/or hazardous material in accordance with the provisions of 310 CMR 40.0000: *Massachusetts Contingency Plan"*, the proposed remediation qualifies as a Limited Project and complies with all of the provisions thereto as detailed below:

1. *There are no practicable alternatives to the response action being proposed that are consistent with the provisions of 310 CMR 40.0000: Massachusetts Contingency Plan and that would be less damaging to resource areas.*

   No practicable alternative to the proposed action, consistent with the provisions of MCP, are available that would be less damaging to Wetland Resource Areas. By regulation, selection of the RAM Plan shall be deemed to have met the requirements of the Limited Project Status.

   The objective of the remediation is to remove contaminated soil beneath a gravel laydown area in a previously developed portion of the Site, such that a condition of No Significant Risk is achieved for future use of the Site as a high school. Sanborn Head anticipates that Permanent Solutions will be filed to signify regulatory closure for each RTN after construction is complete. The Permanent Solutions will be supported by MCP Risk Characterizations that demonstrate that a condition of No Significant Risk to human health, safety, public welfare, and the environment has been achieved for use as a high school. The proposed remediation is a necessary action and will improve the Site's capacity to protect the interests of the *Act* and *Ordinance*, including water supply, groundwater supply, and prevention of pollution.

2. *such projects shall be designed, constructed, implemented, operated, and maintained to avoid or, where avoidance is not practicable, to minimize impacts to resource areas.*

   As required, best management practices will be used to minimize construction-related impacts and various short-term and long-term mitigating measures will be implemented that will contribute to the protection of the interests identified in the *Act*. These measures will include limited stockpiling of contaminated soil since direct loading of trucks is anticipated. However, temporary staging of contaminated soil may be necessary due to truck sequencing and schedules. In the event this

occurs, contaminated soil will be stockpiled on polyethylene sheeting or other impervious surfaces and covered or stabilized when not actively being removed.

6.1.1.2 Walking Paths

A meandering, stone mulch with a stabilizing binder walking path and wooden bridges are proposed within Undeveloped Riverfront Area west of the ECD. 310 CMR 10.53(6) states:

Notwithstanding the provisions of 310 CMR 10.58, the Issuing Authority may issue an Order of Conditions permitting as a limited project the construction, rehabilitation, and maintenance of footpaths, bikepaths, and other pedestrian or nonmotorized vehicle access to or along riverfront areas but outside other resource areas, provided that adverse impacts from the work are minimized and that the design specifications are commensurate with the projected use and are compatible with the character of the riverfront area. Generally, the width of the access shall not exceed ten feet of pavement, except within an area that is already altered (e.g., railroad beds within rights of way). Access shall not be located in vernal pools or fenced in a manner which would impede the movement of wildlife. [underline emphasized]

The proposed walking paths meander around the Outdoor Natural Classroom to incorporate a natural element to the educational program and provide an opportunity for community members to enjoy Revere's natural resources through passive recreation. The proposed walking path and wooden bridges measure 6-feet-wide and no fencing is proposed which would impede wildlife movement. There are no Vernal Pools within or near the Site.

6.1.2 Bordering Vegetated Wetlands

The proposed stormwater management system design involves a connection to two (2) existing stormwater outfall (Appendix D3, "Outfall 1 and Outfall 3") and four (4) new stormwater outfalls (Appendix D3, "Outfalls 2 and 4 through 6") proximate to the ECD. Installation of stormwater infrastructure will result in 226± square feet of temporary impacts to BVW associated with the ECD. Temporary BVW impacts will be restored in place.

The following provides the project's compliance with performance standards for alteration to BVW provided at 310 CMR 10.55(4)(b), which states:

Notwithstanding the provisions of 310 CMR 10.55(4)(a), the issuing authority may issue an Order of Conditions permitting work which results in the loss of up to 5000 square

feet of Bordering Vegetated Wetland when said area is replaced in accordance with the following general conditions and any additional, specific conditions the issuing authority deems necessary to ensure that the replacement area will function in a manner similar to the area that will be lost:

1. the surface of the replacement area to be created ("the replacement area") shall be equal to that of the area that will be lost ("the lost area");

The Applicant proposes to restore all temporarily impacted BVWs in place. As such, restored BVW is located in the same location as the "lost" area.

2. the ground water and surface elevation of the replacement area shall be approximately equal to that of the lost area;

The BVW to be altered will be regraded to pre-existing grades and the surface elevation of the restoration areas will not change as a result.

3. The overall horizontal configuration and location of the replacement area with respect to the bank shall be similar to that of the lost area;

The Applicant proposes to restore all temporarily impacted BVWs in place. As such, the horizontal configuration will be restored to pre-construction conditions following restoration.

4. the replacement area shall have an unrestricted hydraulic connection to the same water body or waterway associated with the lost area;

Wetland restoration areas will continue to have an unrestricted hydraulic connection to the ECD following completion of construction.

5. the replacement area shall be located within the same general area of the water body or reach of the waterway as the lost area;

The temporarily impacted BVWs will be restored in place and remain in the same area as the "lost" area.

6. at least 75% of the surface of the replacement area shall be reestablished with indigenous wetland plant species within two growing seasons, and prior to said vegetative reestablishment any exposed soil in the replacement area shall be temporarily stabilized to prevent erosion in accordance with standard U.S. Soil Conservation Service methods; and

LEC will conduct post-construction monitoring for two growing seasons following the completion of the wetland restoration to confirm the successful establishment of

greater than 75% coverage of indigenous wetland plant species. Monitoring reports will be provided to the Commission at the end of each growing season.

7. the replacement area shall be provided in a manner which is consistent with all other General Performance Standards for each resource area in Part III of 310 CMR 10.00. In the exercise of this discretion, the issuing authority shall consider the magnitude of the alteration and the significance of the project site to the interests identified in M.G.L. c. 131, § 40, the extent to which adverse impacts can be avoided, the extent to which adverse impacts are minimized, and the extent to which mitigation measures, including replication or restoration, are provided to contribute to the protection of the interests identified in M.G.L. c. 131, § 40.

The proposed project will result in impacts to Bank, BLSF, and Riverfront Area and will comply with the applicable Performance Standards.

Performance Standards at 310 CMR 10.54(4)(d) and (e) do not apply as the proposed project is not located within an Area of Critical Environmental Concern and is not mapped within any Natural Heritage & Endangered Species Program Estimated or Priority Habitat for Rare Wildlife.

6.1.3 Bank

The proposed stormwater management design involves a connection to two (2) existing stormwater outfall (Appendix D3, "Outfall 1"and "Outfall 3") and four (4) new stormwater outfalls (Appendix D3, "Outfalls 2 and 4 through 6") proximate to the ECD. Two of the outfalls maintain the existing outfall patterns to the ECD (Outfalls 1 and 3). Four new outfalls will be constructed along the ECD through the addition of headwalls and supporting grading. Grading to connect the proposed compensatory storage within the Outdoor Natural Classroom to the ECD for an unrestricted hydrologic connection will result in permanent impacts to Bank.

Installation of stormwater infrastructure will result in 72± linear feet of temporary impacts, and the compensatory storage will result in an additional 20± linear feet of permanent impacts to Bank associated with the ECD.

The proposed projects compliance with Performance Standards for Bank at 310 CMR 10.54(4) are provided below.

(a) Where the presumption set forth in 310 CMR 10.54(3) is not overcome, any proposed work on a Bank shall not impair the following:

1. the physical stability of the Bank;

Temporary impacts to Bank are not anticipated to impair the physical stability of Bank to ECD. The existing Bank is an abrupt, steep slope and permanent impacts are associated with the installation of riprap at the base of outfalls to diffuse stormwater velocity and reduce the potential for scouring. Temporary impacts are associated with grading to accommodate installation of the stormwater outfalls and will be restored following construction. Permanent impacts are associated with grading to accommodate an unrestricted hydrologic connection between the compensatory storage area and the ECD. Impacted Bank will be protected through installation of jute netting and a native seed mix to restore stable slopes.

2. the water carrying capacity of the existing channel within the Bank;

The proposed project has been designed to reduce encroachment into Bank to the extent practicable. Outfalls have been pulled back from the edge of Bank as much as possible to reduce the amount of riprap and associated grading close to Bank. Only temporary impacts occur within the top-of-bank and will not impair the ability for the ECD to continue carrying the level of water flow that it currently supports. Grading associated with the compensatory storage area will tie into elevation 2 on the western Bank to the ECD. Bank is generally at elevation 2 or 3 in this area, and the grading is not anticipated to significantly change the existing Bank. Considering the small area of grading along Bank compared to the remaining undisturbed Bank on-Site, the compensatory storage area is not anticipated to impair the water carrying capacity of the ECD.

3. ground water and surface water quality;

The proposed stormwater management system will improve water quality by installing stormwater management infrastructure in accordance with the Stormwater Management Standards. The proposed design will provide pre-treatment of stormwater from the Site where there currently is none, and the stormwater outfalls have been designed to reduce erosion and siltation into the ECD.

4. the capacity of the Bank to provide breeding habitat, escape cover and food for fisheries;

Bank is comprised of a steep embankment dominated by common reed (*Phragmites australis*). Water levels in the ECD are inconsistent and flashy, responding to storm events and the discharge of off-site stormwater into the ECD. While the stream was presumed perennial due to the USGS mapping, the

ECD periodically dries up exposing the Banks. To the extent that fisheries are present in this upper reach of the ECD, the dense vegetation may provide escape cover and habitat, although the dense stands of Japanese knotweed and common reed may also crowd out space for fish to navigate the ditch and access the Banks. Nonetheless, the proposed temporary/permanent impacts to Bank are not anticipated to result in an impact to the capacity for the ECD to provide breeding habitat, escape cover and food for fisheries.

5. the capacity of the Bank to provide important wildlife habitat functions. A project or projects on a single lot, for which Notice(s) of Intent is filed on or after November 1, 1987, that (cumulatively) alter(s) up to 10% or 50 feet (whichever is less) of the length of the bank found to be significant to the protection of wildlife habitat, shall not be deemed to impair its capacity to provide important wildlife habitat functions. In the case of a bank of a river or an intermittent stream, the impact shall be measured on each side of the stream or river. Additional alterations beyond the above threshold may be permitted if they will have no adverse effects on wildlife habitat, as determined by procedures contained in 310 CMR 10.60.

The Proponent proposes to alter a cumulative 92± LF of Bank, exceeding the above-referenced threshold. However, 72± LF of Bank will be restored in-place and as such, the proposed impacts are not anticipated to impair the capacity of the Bank to provide wildlife habitat functions. LEC completed the Wildlife Habitat Evaluation – Appendix A in accordance with 310 CMR 10.60 (Appendix H).

6. Work on a stream crossing shall be presumed to meet the performance standard set forth in 310 CMR 10.54(4)(a) provided the work is performed in compliance with the Massachusetts Stream Crossing Standards by consisting of a span or embedded culvert in which, at a minimum, the bottom of a span structure or the upper surface of an embedded culvert is above the elevation of the top of the bank, and the structure spans the channel width by a minimum of 1.2 times the bankfull width. This presumption is rebuttable and may be overcome by the submittal of credible evidence from a competent source. Notwithstanding the requirement of 310 CMR 10.54(4)(a)5., the impact on bank caused by the installation of a stream crossing is exempt from the requirement to perform a habitat evaluation in accordance with the procedures contained in 310 CMR 10.60.

The proposed project does not involve any work on a stream crossing. The existing crossings can support the intended use in the proposed conditions. Additionally, the ECD will continue to provide adequate water carrying capacity in post-construction conditions, as documented in the *Stormwater Report* (Attachment I).

(b) Notwithstanding the provisions of 310 CMR 10.54(4)(a), structures may be permitted in or on a Bank when required to prevent flood damage to facilities, buildings and roads constructed prior to the effective date of 310 CMR 10.51 through 10.60 or constructed pursuant to a Notice of Intent filed prior to the effective date of 310 CMR 10.51 through 10.60 (April 1, 1983), including the renovation or reconstruction (but not substantial enlargement) of such facilities, buildings and roads, provided that the following requirements are met: 1. The proposed protective structure, renovation or reconstruction is designed and constructed using best practical measures so as to minimize adverse effects on the characteristics and functions of the resource area; 2. The applicant demonstrates that there is no reasonable method of protecting, renovating or rebuilding the facility in question other than the one proposed.

The proposed project does not include new structures in or on Bank. The only impacts to Bank are associated with grading to support installation of riprap spillways for stormwater outfalls.

(c) Notwithstanding the provisions of 310 CMR 10.54(4)(a) or (b), no project may be permitted which will have any adverse effect on specified habitat sites of Rare Species, as identified by procedures established under 310 CMR 10.59.

The Site is not mapped within any Natural Heritage & Endangered Species Program Estimated or Priority Habitat for Rare Wildlife.

6.1.4 Bordering Land Subject to Flooding

The proposed project is anticipated to result in 776,259± sf of work within BLSF up to elevation 4.55 (NAVD 88). Existing and proposed conditions with respect to BLSF are depicted on the *Bordering Land Subject to Flooding Plan* (Appendix D1, Fig-4). Compensatory Flood Storage is provided throughout the Site and west of the ECD to mitigate impacts to BLSF (Appendix E2, *Compensatory Storage Figure*).

The project is required to provide compensatory flood storage volumes for BLSF (up to el. 4.55 NAVD88) displaced by the proposed redevelopment. The compensatory storage

design also is required to ensure that flow paths for floodwater entering and leaving the Site do not cause scour. This is achieved through the following design features:

The proposed projects compliance with Performance Standards for BLSF at 310 CMR 10.57(4)(a) are provided below.

1. *Compensatory storage shall be provided for all flood storage volume that will be lost as the result of a proposed project within Bordering Land Subject to Flooding, when in the judgment of the issuing authority said loss will cause an increase or will contribute incrementally to an increase in the horizontal extent and level of flood waters during peak flows.*

   Compensatory storage shall mean a volume not previously used for flood storage and shall be incrementally equal to the theoretical volume of flood water at each elevation, up to and including the 100-year flood elevation, which would be displaced by the proposed project. Such compensatory volume shall have an unrestricted hydraulic connection to the same waterway or water body. Further, with respect to waterways, such compensatory volume shall be provided within the same reach of the river, stream or creek.

   The proposed compensatory storage provides unrestricted hydraulic connections to the ECD, as depicted in the *Flood Progression and Recession Figures* (Appendix D4 and D5), fulfilling the requirement for unrestricted flow to the same waterway. Site grading was designed to allow overland flow of floodwaters onsite towards the outfalls and the edges of the ECD, ensuring that the floodwater can exit the site in the same manner that it enters (via the ECD).

   The compensatory storage design ensures that the volume of floodwater displaced by the project is fully replaced *and* provides 5,116.79 CY of additional flood storage. This volume is calculated at 1-foot elevation intervals, up to the BLSF elevation 4.55, ensuring that no floodwater is lost at any elevation interval. The *Compensatory Storage Figure* (Appendix E2) and *Plan* (Sheets C-401 – C406, Attachment J) demonstrate that the compensatory storage volume is distributed across the site at elevations from 0 to 4.55 NAVD88. Compensatory storage is provided at the following elevation intervals and volumes:

Table 3: Compensatory Storage Volumes (1-foot intervals) in CY			
Elevation (NAVD88)	Storage Required	Storage Provided	Net Volume*
0' – 0.99'	30.07	53.70	23.63
1' – 1.99'	251.01	1,436.26	1,185.25
2' – 2.99'	3,621.66	3,667.34	45.68
3' – 3.99'	15,467.16	15,691.29	224.13
4' – 4.55'	13,603.98	17,242.11	3,638.10
TOTAL	32,973.88	38,090.67	5,116.79

A positive surplus of Net Volume indicates additional onsite storage provided by the proposed Site design compared to the existing condition.

To maximize flow paths and ensure floodwaters can pass below the building, and provide compensatory storage, the parking garage was designed to be an open-air garage set at elevation 4 NAVD88. The design of the parking beneath the podium style building allows floodwater and runoff to flow beneath the structure, providing flowpaths for movement of floodwaters to the ECD. This is demonstrated in the *Compensatory Storage Figure* and *Flood Progression and Recession Figures*, as floodwaters and compensatory storage is depicted within the building footprint.

2. Work within Bordering Land Subject to Flooding, including that work required to provide the above-specified compensatory storage, shall not restrict flows so as to cause an increase in flood stage or velocity.

The site grading allows for floodwater to move from any storage area to the ECD, allows for overland flow of floodwater to the ECD, and is designed so floodwaters will not be restricted or cause an increase in flood stage or velocity. The base elevation of the at grade parking beneath the podium style building is set at elevation 4 NAVD88, allowing floodwaters and runoff to pass underneath the building. Additionally, surface basins are designed to store larger storm events without contributing to higher flood stages or velocities. The overall Site grading and stormwater management design work together to ensure that floodwaters are managed without restricting flow or causing adverse impacts on flood stage or velocity.

3. Work in those portions of bordering land subject to flooding found to be significant to the protection of wildlife habitat shall not impair its capacity to provide important wildlife habitat functions. Except for work which would adversely affect vernal pool habitat, a project or projects on a single lot, for which Notice(s) of Intent is filed on

or after November 1, 1987, that (cumulatively) alter(s) up to 10% or 5,000 square feet (whichever is less) of land in this resource area found to be significant to the protection of wildlife habitat, shall not be deemed to impair its capacity to provide important wildlife habitat functions. Additional alterations beyond the above threshold, or altering vernal pool habitat, may be permitted if they will have no adverse effects on wildlife habitat, as determined by procedures contained in 310 CMR 10.60.

The Site is not mapped within any Natural Heritage & Endangered Species Program Estimated or Priority Habitat for Rare Wildlife and there are no potential or certified vernal pools.

The proposed project will result in more than 5,000 square feet of impacts to BLSF. However, the vast majority of these impacts occur within areas defined in the *Act Regulations* at 310 CMR 10.57(1)(a)2 as "areas so extensively altered by human activity that their important wildlife habitat functions have been effectively eliminated." Therefore, the proposed project will not impact the capacity of the existing BLSF to provide important wildlife habitat functions.

Instead, the proposed project will result in an improvement over existing conditions through a decrease in impervious area by 7.14± acres and an increase in naturally vegetated areas. As such, the proposed project is anticipated to result in an improvement to wildlife habitat particularly when compared to existing conditions.

The natural vegetation (meadow and vegetated earthen berm) to be converted to the outdoor natural classroom (west of the ECD) provides wildlife habitat, as evident through direct observations of song birds, rabbits, squirrels, and burrow holes along the earthen berm. This area will be graded to include compensatory storage and will be revegetated with a diverse vegetative community including berry and nut producing plants. Invasive, non-native species such as Japanese knotweed, multiflora rose, and common reed also will be removed in this area. Regrading the area will create tiers of habitat types within a landscape currently only providing meadow and sapling layers. While construction activities will likely temporarily displace wildlife species, the proposed conditions will result in an improvement to vegetative diversity, cover type, and habitat type and will thereby benefit wildlife species.

6.1.5 Riverfront Area

Nitsch Engineering calculated a total of 522,775± square feet of Riverfront Area on the Site (Appendix D1, Fig-1 and Fig-3). The Riverfront Area under existing conditions is

further divided into Previously Developed, Degraded, and Undeveloped areas, as summarized below:

- Previously Developed (former dog racetrack): 9,269± sf
- Degraded (i.e. pavement, gravel, lack of topsoil): 302,139± sf
- Undeveloped (naturally vegetated areas): 211,367± sf

Proposed work within the former dog racetrack is considered a redevelopment of 'Previously Developed' Riverfront Area in accordance with 310 CMR 10.58 (5). However, 10.58 (4) applies to alteration of 'Previously Developed' Riverfront Area that does not qualify as 'Degraded.'

Accordingly, regulatory compliance for work within Riverfront Area has been divided to address applicable performance standards for the type of alteration proposed. Accordingly, compliance with the performance standards associated with 'Degraded' Riverfront Area in 310 CMR 10.58 (5), and compliance with the performance standards for 'Undeveloped' Riverfront Area and 'Previously Developed' (but not 'Degraded') Riverfront Area under 310 CMR 10.58 (4) is provided below.

The proposed walking path proposed within Undeveloped Riverfront Area west of the ECD meets the criteria for a Limited Project, as described above in Section 6.1.1.

6.1.5.1 **'Undeveloped' Riverfront Area and 'Previously Developed' (but not 'Degraded') Riverfront Area [310 CMR 10.58(4)]**

Compliance with the performance standards under 310 CMR 10.58 (4) is required for the 109,847± square feet of work within naturally vegetated Riverfront Area and those portions of 'Previously Developed' Riverfront Area that do not qualify as 'Degraded.' (i.e., the former dog racetrack totaling 9,269± sf).

(a) *Protection of Other Resource Areas:* The entire Site is protectable as LSCSF and the proposed project also will result in temporary and/or permanent impacts to BVW, Bank, and BLSF. As noted in Sections 6.1.1 through 6.1.4, the proposed project complies with applicable performance standards for BVW, Bank, and BLSF. The proposed project has been designed to protect Wetland Resource Areas during construction and will result in an improvement to existing conditions.

(b) *Protection of Rare Species*: The Site is not contained within Rare Species Habitat as noted above in Section 2.1;

(c) *Practicable and Substantially Equivalent Economic Alternatives*: An Alternatives Analysis is provided below; and

(d) *No Significant Adverse Impact*: A discussion of Significant Adverse Impacts is provided below.

6.1.5.2 **Alternatives Analysis**

For this project, the scope of alternatives falls under the following regulations at 310 CMR 10.58 (4) (c) 2. c., which states:

Except as allowed under 310 CMR 10.58(4)(c)2.b., the area under consideration for practicable alternatives extends to the original parcel and the subdivided parcels, any adjacent parcels, and any other land which can reasonably be obtained within the municipality for: ii. activities conducted by municipal government.

The purpose of the project and work within Riverfront Area is to replace the existing, undersized, 50-year-old Revere High School, located at 101 School Street, and alleviate systemwide-overcrowding. Unlike typical developments where new construction is proposed to serve a need that does not presently exist; this project involves relocating an existing use, alleviating school-systemwide overcrowding, and accommodating anticipated growth in student population.

Beginning in April 2020, the Applicant engaged with the Massachusetts School Building Committee (MSBA) to define a range of configuration options to explore regarding the condition of Revere High School at 101 School Street. Subsequently, the project team prepared a feasibility study focused on several major tracks of study, including: a base repair of Revere High School; an extensive search for adequately sized parcels of land within the City that could host a new school; educational visioning; educational programming; and development of alternatives. The feasibility study included extensive input provided by the School Board Committee (SBC), educators, administrators, parents, students, and members of the public through several in-person Open Sessions, Public Forums, and Faculty Forums.

Throughout and following the feasibility study, the Proponent, SBC, and project team embarked on a thorough alternatives analysis prior to selecting the preferred Site. Alternatives to the Preferred Project include: 1) Renovation, Addition, and/or Rebuilding Revere High School at 101 School Street; 2) New Construction at Revere Housing Authority Site (Cooledge Street); and 3) New Construction at Wonderland (the Preferred Option).

The No-Build Alternative was deemed infeasible, as Revere High School is undersized, outdated, in need of repair, and does not adequately serve the educational needs, as described in the Renovation Alternative below.

Renovation/Addition/Rebuild Existing Revere High School (101 School Street)/No-Build

The 16.1± acre site includes the existing Revere High School, athletic fields, paved driveways and parking lots, and Erricola Park. The site is adjacent to Rumney Marsh Academy, is surrounded by residential development, and Route 1A occurs along the eastern property boundary. The site is currently built to the maximum extent feasible to support the student population and educational programming needs, and opportunities for growth on-site are limited. An addition to the existing building would occur near the field house hosting athletic programs and would disrupt student activities. Additionally, portions of the existing building would need to be demolished with the renovation, which would continue disruption from an educational perspective and alter indoor athletic programs for 12 to 18 months. Options to build an addition and renovate the existing school were quickly deemed infeasible due to the site constraints with respect to existing development and athletic facilities, which would significantly disrupt students' education and athletic opportunities at the Site.

New construction would have required expanding the development footprint to accommodate constructing the new school while allowing students to remain in the existing school. Part of this expansion included repurposing Erricola Park, which would require an Article 97 Land Transfer and replacement of the park elsewhere to complete the Project, and creates a difficult challenge with construction scheduling to ensure the park system is available throughout the project. Additionally, new construction would require expanding into a few abutting residential properties, which would result in eminent domain of dwellings and displacement of residents.

Due to the complications with renovations disrupting educational programs, the long and arduous construction schedule, and inability for the renovation and addition to meet programmatic goals, the Proponent rejected this alternative and proceeded forward to consider new construction. Additionally, based on the information provided above, both the No-Build option and renovation of Revere High School were deemed infeasible.

Cooledge Street

The Applicant, SBC, and project team performed an analysis of available properties within the City of Revere based on available GIS mapping, property records, and knowledge of the community. Through an analysis of site constraints (i.e., wetland resource areas, proximity to the center of Revere, disconnection from pedestrian access, challenging geology, and available space for the building and program), the list of potential sites for further evaluation was condensed to the aforementioned 101 School

Street, new construction at Cooledge Street (i.e., Revere Housing Authority Site), and Wonderland (the Preferred Option).

Although the Revere Housing Authority (RHA) Site was initially a top contender for site selection as the most centrally located property with ample space to design an entire campus solution, this option was quickly dismissed by the RHA Board early in the Preferred Schematic Report phase. The RHA Site is an occupied, active public housing site controlled by RHA and owned by the City of Revere. Construction at the RHA Site would require the replacement of 154 homes and relocation of existing occupants into new local housing. Displacement of residents was deemed impractical when other sites that would not result in residential displacement were available, and when RHA voted to discontinue discussions about a potential partnership.

Wonderland (Preferred Option)

Following careful analysis and evaluation of alternative properties, the Site was selected by the SBC and City Council through a vote on January 3, 2024 to complete design and construct the new Revere High School. The Preferred Option at Wonderland (the Site) was selected for a number of reasons, including underutilization and lack of any significant improvements since closure of the Wonderland Greyhound Park in 2010. Development at the Site also would not require Article 97 Land Transfers and would not result in displacement of Revere residents to accommodate construction. During the feasibility study, the Site was under private ownership and required a taking through eminent domain for the purpose of the proposed project.

Several iterations of the schematic design have been produced by the project team. However, most of the designs have intentionally shown new development within the eastern portion of the Site to minimize impacts to existing vegetated areas (i.e. Undeveloped Riverfront Area) and utilize opportunities to redevelop existing Previously Developed and Degraded Riverfront Area. East of the ECD, the Site is almost entirely comprised of cracked and degraded pavement, remnant foundations, invasive species, and minimal stormwater management infrastructure. The project team and SBC determined that the southern portion of the Site was the appropriate location for the school as this portion of the Site is highest in elevation and allows for a lower ground-floor building elevation with respect to the 100-year floodplain. Except for access from Dunn Road, the existing vegetated areas west of the ECD would remain vegetated and utilized to create compensatory storage and incorporate passive recreational and educational opportunities.

Three (3) colored renderings are included in Appendix F depicting a few of the numerous alternative layouts consdered. Alternative #1 is generally similar to the preferred configuration with respect to overall layout, but was dismissed as the building layout was not selected by the SBC. Additionally, internal driveways and access from Dunn Road were expanded from the Alternative #1 layout for circulation and safety purposes (i.e. multiple ingress and egress, emergency access). This alternative was an early conceptual plan and did not include stormwater management features.

Alternatives #2 and #3 include the preferred building layout that the SBC voted to approve. Alternatives #2 and #3 site the building centrally located within the eastern portion of the Site in order to minimize impacts to the non-bordering Freshwater Wetland. While preferable to avoid and minimize impacts to the locally-jurisdictional non-bordering Freshwater Wetlands, these alternatives reduced the available space to redevelop the Site, eliminated athletic fields, and limited the ability to implement all programmatic needs. The building also is located within the lower-lying portion of the Site in these alternatives, which would have required the base occupancy level of the building to be higher in elevation and would place the building almost entirely within BLSF. The Proponent preferred to site the building in a portion of the Site where the design would meet Massachusetts State Building Code and keep the base occupancy level of the building as close to grade as feasible.

The preferred option (proposed project) achieves a balance of meeting the programmatic needs for students and faculty, protection of Wetland Resource Areas, and improvements to Degraded and Previously Developed Riverfront Area.

6.1.5.3 **No Significant Adverse Impact**

310 CMR 10.58 (4) (d) states:

The work, including proposed mitigating measures, must have no significant adverse impact on the riverfront area to protect the interests identified in M.G.L. c. 131, s. 40…

310 CMR 10.58 (4) (d) 1. states:

Within 200 foot Riverfront Areas, the issuing authority may allow the alteration of up to 5000 square feet or 10% of the riverfront area within the lot, whichever is greater, on a lot recorded on or before October 6, 1997 or lots recorded after October 6, 1997 subject to the restrictions of 310 CMR 10.58 (4) (c) 2.b.vi., or up to 10% of the riverfront area within a lot recorded after October 6, 1997, provided that:

LEC collaborated with Nitsch to calculate the Riverfront Area within the Site extending from the MAHW line associated with the ECD. This analysis concludes that the Site contains 522,775± square feet of Riverfront Area. Therefore, 10% of the total Riverfront Area on the site is 52,277.5± square feet, which is greater than the 5,000 square-foot threshold enumerated above. Based on a review of publicly available information on the Revere Assessor's database, the lots comprising the Site have been established and un-changed since at least 1948 (Appendix B). As such, the 10% alteration threshold applies to the project.

As described above in Section 6.1.5.1, Riverfront Area alteration subject to 310 CMR 10.58 (4) includes 109,847± square feet of 'Undeveloped' Riverfront Area (i.e., naturally vegetated areas) and 9,269± square feet of 'Previously Developed' Riverfront Area that does not qualify as 'Degraded (i.e., former dog racetrack).

While the total amount of Riverfront Area alteration subject to 310 CMR 10.58 (4) exceeds 10% of the Riverfront Area on the Site, redevelopment within Previously Developed Riverfront Area (9,269± square feet) is under the 10% threshold and includes replacing the racetrack with a portion of the building, paved parking area, and landscaping. Proposed landscaping within this portion of the Site will result in an equivalent or improved Riverfront Area function and value compared to existing conditions.

The 109,847± square feet of Undeveloped Riverfront Area (west of ECD) alteration exceed the 10% threshold. However, the proposed work involves conversion of a vegetated earthen berm comprised of invasive, non-native plants, and routinely mowed groundcover to a naturalized outdoor learning classroom. The Natural Outdoor Classroom will be regraded to provide Compensatory Storage, will be revegetated with a diverse selection of native and native cultivar vegetation, and an Osprey nest will be installed within the Riverfront Area. Work proposed within Undeveloped Riverfront Area also includes construction of walking paths and boardwalks, resulting in 25,731± square feet of new "Degraded" areas within Riverfront Area. None-the-less, the net reduction of Degraded Riverfront Area resulting from the proposed project far exceeds new Degraded areas. Accordingly, the Site will contain significantly more naturally-vegetated Riverfront Area compared to existing conditions, and significantly less impervious surface compared to existing conditions following construction.

(a) *At a minimum, a 100-foot wide area of undisturbed vegetation is provided…If there is not a 100-foot wide area of undisturbed vegetation within the riverfront area,*

existing vegetative cover shall be preserved or extended to the maximum extent feasible to approximate a 100-foot wide corridor of natural vegetation…

Under existing conditions, the closest developed area (pavement) measures 0±-feet from the ECD. The closest project component to the ECD in Undeveloped or Previously Disturbed Riverfront Area is at least 1±-feet from the ECD and as such, proposed conditions do not encroach closer to the ECD compared to existing conditions. The proposed project includes restoration of Degraded and Previously Developed Riverfront Area through implementation of native, native cultivars, and naturalized plantings between the proposed development and the ECD, in addition to non-contiguous areas within Riverfront Area. The proposed project will result in a 51,013± square foot increase of naturally vegetated areas within Riverfront Area.

(b) *Stormwater is managed according to the standards established by the Department in its Stormwater Policy.*

As summarized in Section 5.2 above, and in the *Stormwater Report*, the proposed stormwater management features are designed in accordance with the MassDEP Stormwater Standards for redevelopment.

(c) *Proposed work does not impair the capacity of the riverfront area to provide important wildlife habitat functions…*

The preamble to 310 CMR 10.58 for Riverfront Area states that "in those portions so extensively altered by human activity that their important wildlife habitat functions have been effectively eliminated, riverfront areas are not significant to the protection of important wildlife habitat…" This language mirrors the preamble language in 310 CMR 10.57 which includes a statement that such areas include paved areas, buildings, lawns, etc. This applies to Degraded Riverfront Area primarily located east of the ECD and including portions of Dunn Road and the gravel laydown area west of the ECD.

The 9,269± square feet of Previously Developed Riverfront Area may provide some level of wildlife habitat at existing conditions, as groundcover and shrub vegetation has colonized within the former racetrack. Potential use for overwintering, food, shelter, and migratory stop points is available in this area. However, under proposed conditions, the increase in naturally vegetated areas will mitigate the loss of this relatively small footprint in the context of the entire Site.

As described in Section 5.4, dense stands of common reed, patches of Japanese knotweed, Asiatic bittersweet, common buckthorn, autumn olive, Tatarian

honeysuckle, and multiflora rose occur within the Site, and notably, within Riverfront Area. The 109,847± square feet of natural vegetation (meadow and vegetated earthen berm) to be converted to the outdoor natural classroom provides wildlife habitat, as evident through direct observations of songbirds, rabbits, squirrels, and burrow holes along the earthen berm. As previously noted, this area will be graded to provide compensatory flood storage and will be revegetated with a diverse native, native cultivar, and naturalized vegetative community including berry and nut producing plants. As a result, invasive, non-native species such as Japanese knotweed, multiflora rose, and common reed also will be removed in this area. Additionally, grading the area will create tiers of habitat types within a landscape currently only providing meadow and sapling layers. While construction activities will likely temporarily displace wildlife species, the proposed conditions will result in an improvement to vegetative diversity, cover type, and habitat type and will thereby benefit wildlife species.

(d) Proposed work shall not impair groundwater or surface water quality by incorporating erosion and sedimentation controls and other measures to attenuate nonpoint source pollution.

Erosion controls will be installed along the LOW to protect the ECD and associated BVWs during construction, and stormwater management structures are proposed to collect, store, and pre-treat stormwater runoff from the existing impervious features.

6.1.5.4 **Redevelopment Within Previously Developed Riverfront Areas**

310 CMR 10.58 (5) states:

Redevelopment Within Previously Developed Riverfront Areas: Restoration and Mitigation. Notwithstanding the provisions of 310 CMR 10.58 (4) (c) and (d), the issuing authority may allow work to redevelop a previously developed riverfront area, provided the proposed work improves existing conditions. Redevelopment means replacement, rehabilitation, or expansion of existing structures…A previously developed riverfront area contains areas degraded prior to August 7, 1996 by impervious surfaces from existing structures or pavement, absence of topsoil…Work to redevelop previously developed riverfront area shall conform to the following criteria:

(a) At a minimum, proposed work shall result in an improvement over existing conditions of the capacity of the riverfront area to protect the interests identified in M.G.L. c. 131, s. 40. When a lot is previously developed but no portion of the riverfront area is degraded, the requirements of 310 CMR 10.58 (4) shall be met.

The project results in an improvement to the Riverfront Area by increasing the amount of naturally-vegetated land within the Riverfront Area, reducing impervious surface within the Riverfront Area by 51,013± square feet, and increasing the distance between the impervious surface and the ECD from 0-feet to 1-feet.

(b) *Stormwater management is provided according to standards established by the Department.*

As summarized in Section 5.2 above, and in the *Stormwater Report*, the proposed stormwater management features are designed in accordance with the MassDEP Stormwater Standards for redevelopment.

(c) *Within 200-foot riverfront areas, proposed work shall not be located closer to the river than existing conditions or 100 feet, whichever is less….*

While work will occur within the 100-foot Riverfront Area, proposed work is not located closer to the ECD than existing conditions. The conversion of pavement to naturally vegetated areas increases the amount of naturally-vegetated land within the Riverfront Area.

(d) *Proposed work, including expansion of structures, shall be located outside the riverfront area or toward the riverfront area boundary and away from the river, except in accordance with 310 CMR 10.58 (5) (f) or (g).*

The project has been designed to reduce Degraded (impervious) area within Riverfront Area by 51,013± square feet and increase the distance between impervious surfaces and the ECD from 0-feet to 1-feet.

(e) *The area of proposed work shall not exceed the amount of the degraded area, provided that the proposed work may alter up to 10% if the degraded area is less than 10% of the riverfront area, except in accordance with 310 CMR 10.58 (5) (f) or (g).*

The Site contains 522,775± square feet of Riverfront Area, and 10% of the total Riverfront Area on the Project Site is 52,277.5± square feet. Currently, there are 302,139± square feet of Degraded Riverfront Area within the Site, which far exceeds the 10% threshold. The project proposes 251,126± square feet of impervious area (pavement, building, sidewalks), which is less than the amount of existing Degraded Area. Restoration and/or additional Riverfront Area mitigation in accordance with 310 CMR 10.58 (5) (f) and/or (g) is not required since Degraded Riverfront Area will be reduced. Specifically, the proposed project will *reduce* impervious area within the

Riverfront Area by 51,013± square feet, or 9.8% of the total Riverfront Area on the Site.

6.2 Non-Bordering Vegetated Wetlands

The proposed project will result in permanent impacts to the B-series non-bordering Freshwater Wetland located within the former dog racetrack, which is protected only under the *Ordinance*. There are no specific performance standards for work within Wetland Resource Areas or Buffer Zones under the *Ordinance*. On August 7, 2024, the project team presented and discussed a list of environmentally-related mitigation with the Commission, as further detailed above in Section 5. The project team received support for site improvements that were considered to be a meaningful and acceptable means of mitigation. Mitigation includes a significant reduction in impervious areas at a 3.5:1 ratio to the size of the non-bordering Freshwater Wetland, creation of compensatory flood storage throughout the Site, increasing flood storage on-Site, increased landscaping, improvements to wildlife habitat, reduction in invasive species, stormwater management improvements, and other improvements detailed in Section 5.5.

7. Summary

On behalf of the Applicant, The City of Revere, LEC is filing this NOI Application with the Revere Conservation Commission for construction of Revere High School at 190 Veterans of Foreign Wars Parkway and portions of Dunn Road in Revere. Proposed work activities include removal of vegetation and pavement; construction of a new four-story, podium style, 422,500± gross square foot building; internal paved driveways; paved parking lots; synthetic turf athletic fields and tennis courts; stormwater management infrastructure; outdoor classrooms; grading; and landscape plantings; and remediation of hazardous materials identified through MCP.

Portions of the proposed activities are located within BVW, Bank, Riverfront Area, BLSF, LSCSF, and the 100-foot Buffer Zone, protectable under the *Act*, the *Act Regulations*, and the *Ordinance;* and a non-bordering Freshwater Wetland only protectable under the *Ordinance*. The Applicant proposes erosion controls and stormwater management in accordance with DEP Stormwater Management Regulations, a reduction in impervious areas, and Riverfront Area restoration to improve the existing conditions. Accordingly, the Applicant requests that the Commission issue an Order of Conditions approving the project as proposed herein.

Massachusetts Natural Heritage and Endangered Species Program Atlas of Estimated Habitat of State-listed Rare Wetlands Wildlife, Natural Heritage & Endangered Species Program, Massachusetts Division of Fisheries & Wildlife, Route 135, Westborough, MA 01581, www.state.ma.us/dfwele/dfw

Massachusetts Wetlands Protection Act (M.G.L. c. 131, §. 40), www.state.ma.us/dep
Massachusetts Wetlands Protection Act Regulations (310 CMR 10.00), www.state.ma.us/dep

Revere, MA Code of Ordinances Chapter 16.04 - Wetlands Protection
https://library.municode.com/ma/revere/codes/code_of_ordinances?nodeId=TIT16EN

National Flood Insurance Program, Federal Emergency Management Agency Flood Insurance Rate Map, City of Revere, Massachusetts. March 16, 2016 (Community Panel Number 25025C0036J)

New England Hydric Soils Technical Committee. 2020, 4th ed., *Field Indicators for Identifying Hydric Soils in New England,* New England Interstate Water Pollution Control Commission, Lowell, MA.

Reed, P.B. 1988. *National List of Plant Species that Occur in Wetlands: 1988 Massachusetts*. U.S. Department of the Interior, Fish and Wildlife Service. NERC-88/18.21