

**JOINT MEETING
SELECT BOARD, PARK & RECREATION COMMISSION,
BOARD OF HEALTH, SCHOOL COMMITTEE, FINANCE
COMMITTEE & COMMUNITY PRESERVATION COMMITTEE
5:30 P.M. February 15, 2023
Needham Town Hall, Powers Hall + Zoom
Agenda**

To listen and view this virtual meeting on a phone, computer, laptop, or tablet, download the “Zoom Cloud Meeting” app in any app store or at www.zoom.us. At the above date and time, click on “Join a Meeting” and enter the meeting or click the link below to join the webinar: <https://us02web.zoom.us/j/88278879105>

One tap mobile: +13126266799,,88278879105#
Phone #: (312) 626-6799
Webinar ID: 882 7887 9105

5:30	Claxton Field Update
	Introductions
	Presentation Katie King, Assistant Town Manager/Director of Operations Carys Lustig, Director of Public Works Stacey Mulroy, Director of Park & Recreation Timothy McDonald, Director of Health and Human Services
	Board Discussion
	Q&A – open to the public



MEMORANDUM

TO: Select Board, Park & Recreation Commission, Board of Health, School Committee, Finance Committee, and Community Preservation Committee

FROM: Katie King, Assistant Town Manager/Director of Operations; Carys Lustig, Director of Public Works; Timothy McDonald, Director of Health and Human Services; Stacey Mulroy, Director of Park & Recreation

CC: Kate Fitzpatrick, Town Manager; David Davison, Assistant Town Manager/Director of Finance; Dan Gutekanst, Superintendent of Schools; Christopher Heep, Town Counsel

RE: Claxton Field Update

DATE: February 8, 2023

Board and Committee Members:

The Town is hosting a meeting on Wednesday, February 15 at 5:30 pm in Town Hall (Powers Hall) and via Zoom to update you and members of the public about upcoming soil testing at Claxton Field. This memo is aimed to provide foundational information in advance of that meeting.

Background

Claxton Field at 1380 Central Avenue includes two softball fields with an overlapping multi-purpose field, trail access, picnic tables, restrooms, and a parking lot. It had a playground area, which was recently removed. This site served as a burn dump prior to the development of the Recycling and Transfer Station in the 1950s/1960s. Claxton was redeveloped as a recreational facility approximately 60 years ago, when additional soil fill was brought to the site and leveled to create the existing fields.

For many years, the Park & Recreation Department and Department of Public Works (DPW) have identified Claxton Field as a priority for renovation within the Town's annual capital budget process, to upgrade the fields and amenities for Needham residents. There has been strong support from user groups, particularly from the softball community who have limited other field options in town. In 2019, the Park & Recreation Commission submitted a request for design funds to the Community Preservation Committee, which were approved at the October 2020 Town Meeting.

The Town engaged Weston & Sampson (W&S) to provide design, engineering, and environmental services for the renovation project. In December 2021, W&S conducted initial soil borings at Claxton for visual inspection to inform the design. This excerpt summarizes the boring results, which are consistent with the historical use of the site and its conversion to a field:

"The geotechnical engineer observed the subsurface materials to be fairly consistent across all locations. The top six (6) to twelve (12) inches below the grass surface appeared to be comprised of typical topsoil. Below the topsoil, ash, and various solid waste materials (glass, metal fragments, ceramic, wood) were observed intermixed with granular fill. The percentage of these components significantly increased at four feet below grade, at which point distinct layers of ash

were observed in select boring locations, at depths of up to approximately fourteen (14) feet below grade.”¹

From those initial borings, W&S recommended that the Town (1) sample additional shallow test pits to better define the thickness of topsoil materials throughout the site, including the playground area; (2) modify the renovation design to limit excavation of the deeper soil and incorporate proven mitigation strategies including capping the field with a geotextile barrier and bringing in additional fill to build up above that barrier; and (3) consider adding the playground area to the scope of the project. The Town agreed with the first two recommendations and directed W&S to move forward with the additional soil borings and a redesign of the project.

The modified design meant that elements of the renovation that required disturbing soil below the top 6-12 inches would no longer be possible including reorienting the Junior Varsity and Varsity fields to maximize site utilization and installing new field lights. The modified design maintains the current field orientation, modernizes the lights while keeping the existing stanchions, and ensures that amenities such as dugouts and spectator seating are anchored to concrete pads, rather than deep posts.

Modifying the design also meant that the Town could not meet the initial project timeline of completing construction for a Spring 2023 opening. Park & Recreation met with user groups and advanced an updated project schedule to: (1) keep softball at Claxton for 2023, while a conversion of McLeod Field at DeFazio from baseball to softball is constructed in the summer/fall 2023 to open in spring 2024 and (2) move softball to McLeod in 2024 while Claxton is renovated for a Fall 2024 opening. This updated schedule is subject to Town Meeting approval of requested FY24 capital funds for construction (\$1.3M for McLeod and \$1.78M for Claxton, \$1M of which also requires approval of the Community Preservation Committee).

In Spring 2022, W&S provided the Town with results from the second round of soil borings.² These samples showed that debris, including glass and plastic shards, was observed 4 to 7 inches below the playground surface. Out of an abundance of caution, the Town immediately removed the playground structures, placed additional soil on top, reseeded with grass and installed a temporary fence around the area. The borings also confirmed the presence of 10 to 12 inches of topsoil free of debris across the field areas, so the fields remained open and available for continued use.

Town staff and W&S discussed whether additional, voluntary testing to determine the chemical make-up of the soil was warranted. Staff recommended to the Park & Recreation Commission that no further testing be done based on these considerations:

- The borings found 12 inches of topsoil, free of debris, across the playing fields.
- Considering the historic use of the site and types of materials that may be present, W&S does not anticipate the generation of landfill gas or upward migration of the waste materials.
- The Town had already decided to modify the design, treating the subsurface materials as if contaminants are present and proactively adding in relevant mitigation strategies. These modifications include capping the fields with a geotextile barrier and building up on the site,

¹ See Addendum A – 1/27/2022 W&S memorandum

² See Addendum B – 09/22/2022 W&S memorandum

without creating surplus soil that would need to be removed offsite. The design will prevent digging beneath the 12 inches of clean fill into the known debris.

The initial soil borings showing topsoil followed by ash material was consistent with the site's history. Fundamentally, the borings did not provide any unexpected data, nor any new information that would prompt a higher-level of concern about the soil make-up compared to what we knew before the borings. The likelihood of contact with materials below the topsoil by children or other park users was considered unlikely. The change in the renovation design to include the geotextile membrane would further mitigate any risk.

In Summer 2022, a DPW contractor working on a nearby watermain project for the Town was given permission to use a portion of Claxton Field as laydown space. While preparing their laydown space, the contractor excavated some soil and piled it on-site with no advanced notice and without the Town's permission. This prompted outreach from a concerned resident to the Board of Health. DPW and the Public Health Department worked with W&S to identify appropriate mitigation strategies for the contractor to take to safeguard the site. All immediate strategies have been implemented with further work to be done by the contractor as the project is closed out.³

In December 2022, the Director of Health and Human Services was contacted by the MA Department of Environmental Protection (DEP). The agency had received a resident complaint through their enforcement portal. In subsequent meetings, DEP has requested that the Town perform further testing on the chemical make-up of the soil. While Claxton Field is not currently regulated under the Massachusetts Contingency Plan, which sets state reporting and mitigation requirements of landowners, DEP's position is that the Town has an obligation to test based solely on the site's historical use as a burn dump.

Upcoming Soil Testing

The Town has re-engaged W&S to undertake this additional soil testing. W&S has created a soil sampling plan, which has been sent to DEP for their review and approval. Once the plan is approved W&S will work to coordinate the timing of soil sampling and analysis. The intention is to complete the work as quickly as possible with the hope of having preliminary results by mid-March. Those preliminary results will help the Town to identify any changes in operation that may result or any follow-up testing needs.

It is the Town's understanding from speaking with DEP and W&S that there are four levels of possible outcomes from the testing. The first and fourth items are the least likely scenarios.

1. The testing finds that the Claxton site has no reportable contamination. This would allow the Town to consider renovation options to the field that would go beyond the topical approach of our current plan.
2. The testing finds some contamination⁴ at Claxton in the subsurface material, but no contamination in the surface material, allowing the surface to continue to be used. The Town will need to work with DEP and file information with them accordingly. The Town would work with W&S and DEP to ensure that appropriate safeguards are in place during the renovation project. Materials would be kept on site and appropriately capped.

³ See Addendum C – 10/12/2022 W&S memorandum

⁴ I.E. concentrations that require reporting to MassDEP

3. The testing finds some contamination at Claxton in the subsurface and surface material. The type of contamination may trigger the immediate closure of the fields. The Town will need to work with DEP and file information with them accordingly. The Town would work with W&S and DEP to ensure that appropriate safeguards are in place during the renovation project. Materials would be kept on site and appropriately capped.
4. The testing finds contamination at Claxton that would require the Town to close the facility and find a way to remove the contamination from the site. This scenario is unlikely as most mitigation processes prefer that materials not be relocated and would only do so in the most extreme circumstances.

Testing of the pile at the disturbed area will also be conducted and recommendations will be provided on how to manage the pile and appropriately cap the site.

The Town had been pursuing the renovation project assuming that the outcomes in scenario 2 were likely and included this mitigation in the original project.

W&S and their Licensed Site Professional will provide Needham guidance through this entire process in managing the site as it currently stands and any future construction project on the site.

Relocation Plan for Activities

Since we will not know the outcome of the soil testing until close to when NHS Softball begins its season, we have proactively made plans to relocate NHS Varsity Softball to the fields at Broadmeadow School and JV Softball to Avery Field. This will provide predictability for the teams' games and practices. The fields will be updated, groomed, and prepared for the high school teams by DPW's Parks and Forestry division prior to the beginning of the season.

Car washes will be moved to Needham High School.

The Park & Recreation Department will work with all other user groups to identify alternative locations for activities that are normally scheduled at Claxton Field. If testing results conclude that the field can remain open, Park & Recreation will be in touch with each group to coordinate a return to Claxton Field versus remaining at an alternative location.

Questions about Health

Needham's public health staff and elected officials worked with contracted experts to research other communities where similar site mitigation efforts have occurred to better understand possible exposures and any known health impacts. Acknowledging that it is impossible to perform a detailed risk calculation for Claxton Field use until test results are known, there are some commonalities and best practices identified by MA DEP and other communities that will serve to guide our initial work.

For instance, it intuitively makes sense that children and adults who are playing on the Claxton Fields are most likely to be exposed to surface soil and not soil that is at depth. Therefore, since a layer of approximately 12 inches of likely clean topsoil overlays the ball fields, it is likely that exposures to potential contaminants in the ash and solid waste materials in deeper soil has been minimal.

Needham's contractor, Weston & Sampson, will collect samples from both the surface and subsurface soils to determine the contaminants that may be present in soil at the property and their

concentrations. Potential contaminants that are typically present at former burn dumps include polycyclic aromatic hydrocarbons and metals. The Town will be able to provide more information on the potential health risks and toxicity once we have data indicating the substances that are present and the concentrations of those substances.

The exact combination of mitigation measures that will be put into place to ensure the health and safety of the community will be developed by the Town of Needham and its contracted vendor, Weston & Sampson, in consultation with MA DEP. Initial plans (developed pre-testing) included laying down a large geotextile membrane on the site and then importing additional clean fill on top of the membrane; this is a proven strategy to mitigate risks from solid waste materials and it has been implemented in a number of parks and fields throughout the Commonwealth.

Next Steps

Late-February W&S will be on-site to take additional soil samples. Specific date to be determined based on DEP approval of the sampling plan and testing equipment availability.

Mid-March Preliminary results

The Town will schedule a second Joint Board/Committee meeting to update members and the public on the results of the soil testing. The results will also inform next steps on the pending FY24 capital budget request for Claxton construction funds prior to May Town Meeting.

Addendums

- A. 1/27/2022 W&S memo
- B. 9/22/2022 W&S memo
- C. 10/12/2022 W&S memo

MEMORANDUM

TO: Ed Olsen – Superintendent, Parks and Forestry Division, Carys Lustig – Director of Public Works, Stacey Mulroy – Director of Park and Recreation (Town of Needham)

FROM: Cass Chroust (Weston & Sampson)

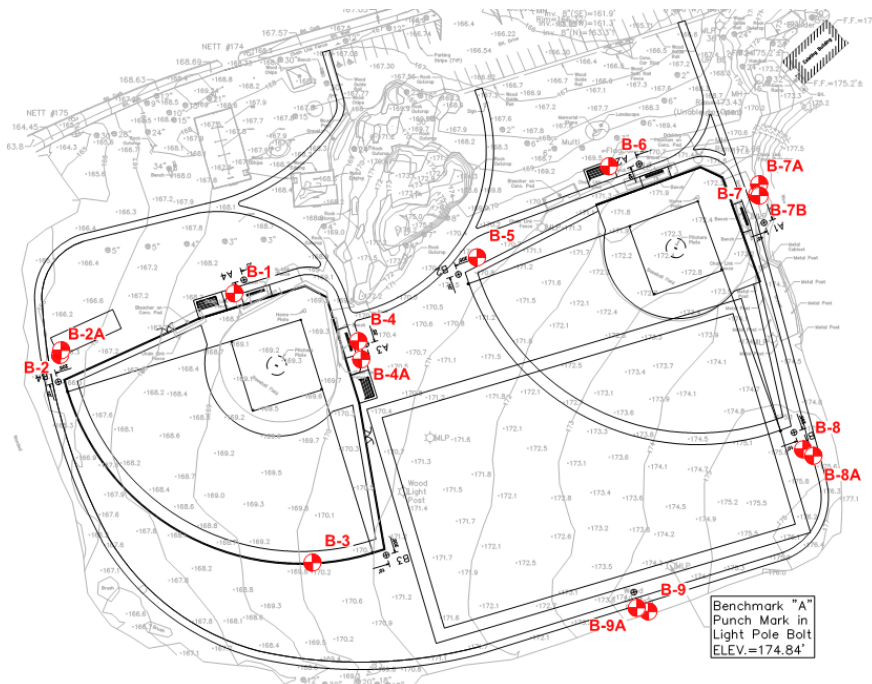
DATE: January 27, 2022

SUBJECT: Claxton Field Environmental Summary and Improvement Recommendation

The Town of Needham retained Weston & Sampson to provide design services for improvements at Claxton Field, located at 1421 Central Avenue. The site is the location of two (2) softball fields with an overlapping rectangular field in the eastern outfield area, sports field lighting, a playground area, a support building, and parking lot. The Town is looking to renovate the athletic facilities at Claxton to be on par with the performance of other facilities in Town which includes grading refinements to the infields and outfields, new dugouts and player benches, new backstops, new outfield fencing, and ADA improvements including a new perimeter pathway for multi-generational use.

Investigation Results Summary

As part of the geotechnical analysis related to new sports lighting foundations, a series of eleven (11) subsurface soil boring explorations were conducted across the site on December 7th, 2021, by Seaboard Drilling and observed by a Weston & Sampson geotechnical engineer. The borings were advanced to depths of up to eighteen (18) feet below current grade and were logged in the field by the geotechnical engineer during advancement. Approximate boring locations are depicted on the figure below.



Prior to initiating the field investigation program, Weston & Sampson was provided anecdotal information from Town representatives regarding the site's historical use as the Town's burn dump prior to the development of the Needham Recycling and Transfer Station in the 1950s / 1960s. The site was never registered with the MassDEP Solid Waste Division either during its operation or following redevelopment as a recreational facility approximately 60 years ago.

The geotechnical engineer observed the subsurface materials to be fairly consistent across all locations. The top six (6) to twelve (12) inches below the grass surface appeared to be comprised of typical topsoil. Below the topsoil, ash and various solid waste materials (glass, metal fragments, ceramic, wood) were observed intermixed with granular fill. The percentage of these components significantly increased at four feet below grade, at which point distinct layers of ash were observed in select boring locations, at depths of up to approximately fourteen (14) feet below grade. Groundwater was observed at depths between eight (8) to ten (10) feet.

The presence of these materials is consistent with the known site history as a municipal burn dump. Note that samples of the materials were not collected for laboratory analysis at the time of boring advancement, and as such, specific information / knowledge regarding the chemical makeup of the materials has not been obtained for the site and is currently unknown. However, based on our experience with similar sites it is likely that metals (lead, arsenic, chromium, etc.) and / or Polycyclic Aromatic Hydrocarbons (PAHs), commonly associated with ash deposits will be present at concentrations in excess of concentrations requiring reporting to MassDEP.

Regulatory Implications

As laboratory analytical results for the subsurface materials have not been obtained, a reporting obligation to MassDEP does not currently exist. However, should earthwork associated with the project require excess materials to be disposed off-site, analytical testing would be required to support acceptance at a disposal facility. Based on this need for sampling, the initially proposed park design (including deeper excavations for light poles, backstops, fencing, etc.) is likely to result in reporting to MassDEP. Following reporting, MassDEP would assign a Release Tracking Number (RTN) and the site would be regulated going forward under the Massachusetts Contingency Plan (MCP). The MCP would require additional assessment, and potentially remediation, to achieve site closure. From our experience with similar projects, this process would likely require multiple years, with considerable cost implications for the Town.

Reporting to MassDEP could be avoided by eliminating off-site disposal of excess materials.

Recommendations and Potential Path Forward

Based on the findings for the site as described above, we recommend the following:

1. Excavation of additional shallow test pits (approximately 12 inches below grade) to better define the thickness of topsoil materials throughout the site, including if ash and solid waste materials are present. We recommend that these test pits also include excavations in the playground area of the site since the final condition and thickness of the existing engineered wood fiber mulch and presence of any other materials is unknown.
2. Modify proposed project design to limit the depth of excavation to approximately six inches, reuse existing topsoil, and import new fill material to build up the finished grade above current elevations. When subgrade is exposed, install a geotextile membrane across the site and limit site improvements to above this membrane. Exclude deeper excavations related to fencing, backstops, and sports lighting.
3. Based on this assessment, the Town should consider expanding the scope of work to include improvements to the playground and new poured-in-place rubber surfacing to serve as a more durable surface above potential waste materials that may be present below the playground.

Risk to Current Park Users

As specific chemical concentrations have not been obtained for the site, a detailed risk calculation for current park users cannot be performed. Based on the observed presence of competent natural turf and underlying topsoil, contact with waste materials by children or other park users is considered unlikely, but cannot be ruled out. The additional test pitting will serve to confirm that this separation exists under current conditions. Note that the test pitting in the playground (and potential future improvements to this area) is recommended as a conservative measure. The proposed geotextile membrane is a proven strategy to further mitigate risks posed by the solid waste materials, which has been implemented in numerous parks and other settings throughout the state effectively. As such, this alteration to design would be considered sufficient for risk mitigation within the limits of the covered area assuming the current use of the fields continues.

Impacts to Project Schedule

The original project schedule intended to develop a complete and detailed scope with cost estimate for funding applications through the Community Preservation Committee by February 2022 and contract level design documents for permitting review in March 2022, all of which would enable the Town to go out to bid in June 2022 after Town Meeting approval in order to complete construction by the Spring of 2023. However, the information discovered through the field investigation requires additional consideration by the Town to determine appropriate next steps related to short- and long-term utilization of the facility and disrupts the funding and permitting process required to keep this project on that accelerated timeline.

Modifying the design approach as recommended above could reduce the impact to the project schedule and cost overages and a complete and detailed scope with cost estimate may be available for review by the Community Preservation Committee for the Special Fall Town Meeting in 2022 should the committee accept the application off-cycle. This would allow for bidding and construction to commence in November or December of 2022, pending results of the hand-dug test pits. If the Town elects to pursue the recommended approach, Weston & Sampson would provide a more detailed project schedule for consideration.

MEMORANDUM

TO: Ed Olsen – Superintendent, Parks and Forestry Division, Carys Lustig – Director of Public Works, Stacey Mulroy – Director of Parks and Recreations (Town of Needham)

CC: Katie King – Assistant Town Manager / Director of Operations (Town of Needham), Gene R. Bolinger, RLA, Cass Chroust, RLA (Weston & Sampson)

FROM: Lee Koska, PE (Weston & Sampson)

DATE: September 22, 2022

SUBJECT: Claxton Field Environmental Investigation Summary and Recommendations

The Town of Needham retained Weston & Sampson to complete excavation of additional shallow test pits to better define the thickness of topsoil material at Claxton Field. Additional shallow test pits were recommended by Weston & Sampson as a part of our *Claxton Field Environmental Summary and Improvement Recommendation Memorandum* dated January 27, 2022. At the request of the Town of Needham, Weston & Sampson completed these additional shallow test pits to further define the depth of ash and various solid waste materials identified during a geotechnical investigation program.

Site Location & Description

Claxton Field is located at 1421 Central Avenue in the Town of Needham, Massachusetts, as shown in Figure 1 – Locus Map. Historically, the site was used as the Town's burn dump prior to the development of the Needham Recycling and Transfer Station in the 1950s / 1960s. The burn sump was never registered with the MassDEP Solid Waste Division either during its operation or following redevelopment as a recreational facility approximately 60 years ago. Currently, the site is the location of two (2) softball fields with an overlapping rectangular field in the eastern outfield area, sports field lighting, a playground area, a support building, and parking lot.

During a geotechnical investigation program conducted by Weston & Sampson at the site on December 7, 2021, ash and various solid waste materials (glass, metal fragments, ceramic, and wood) were observed intermixed with granular fill materials underneath topsoil. A significant increase in ash and various solid waste materials was observed at four (4) feet below ground surface (bgs).

Shallow Test Pitting Activities and Results

On March 15, 2022, Weston & Sampson mobilized to the site to conduct twenty-one (21) shallow test pits using a hand auger. A summary of shallow test pitting results are outlined below. Full test pit descriptions are provided in Table 1.

Park Test Pitting Results

Fourteen (14) test pits were conducted to two (2) feet bgs and were spread throughout the site based on a roughly 140' by 120' grid. One (1) test pit, PB-4, could not be completed due to frozen ground cover. The top 10 to 12 inches consisted of topsoil / loam which was composed of brown, fine to coarse sand with varying amount of clay, silt, and gravel. Topsoil / loam was underlain with fill material consisting of fine to coarse sand with varying amount of silt, glass, ash, metal, and porcelain. See Figure 2 – Site Plan for test pit locations.

Playground Test Pitting Results

Six (6) test pits were conducted to two (2) feet bgs or until the geotextile landscaping liner beneath the playground area, whichever was shallower. In test pits PG-3, PG-4, and PG-5 the top 10 inches consisted of topsoil / loam or sand. Topsoil / loam was composed of brown, fine to coarse sand with varying amount of clay, silt, and gravel and underlain with fill material consisting of fine to coarse sand with varying amount of silt, glass, ash, metal, and porcelain. In shallower test pits, PG-1 (0-6"), PG-2 (0-7"), and PG-6 (0-4"), topsoil / loam was underlain by a geotextile landscaping liner. See Figure 2 – Site Plan for test pit locations.

In general, topsoil / loam was at least 10 to 12 inches thick across the site except in areas where a geotextile landscaping liner was identified. In areas where the geotextile landscaping liner was identified topsoil / loam or sand was at least 4 and 7 inches thick. Ash and solid waste material was generally started around 10 or 12 inches bgs or directly below the geotextile landscaping liner (4 to 7 inches bgs).

Attachments:

Figures

Tables

October 12, 2022

55 Walkers Brook Drive, Suite 100, Reading, MA 01867
Tel: 978.532.1900

Timothy McDonald
Director of Health and Human Services
Town of Needham
Rosemary Recreation Complex
178 Rosemary Street
Needham, MA 02494

Re: **Central Avenue Utility Work Laydown Area
Claxton Field, Needham MA**

Dear Mr. McDonald:

Weston & Sampson Engineers, Inc. (Weston & Sampson) was contacted by the Town of Needham due to a resident complaint regarding health and safety implications from dust and other exposures to potentially impacted soils at Claxton Field (the site). Specifically, concerns were raised due to the current use of a portion of Claxton Field as a laydown area for ongoing construction activities within Central Avenue. The laydown area was previously used as a playground which was removed following identification of solid waste materials and ash below the grass / topsoil and play areas at the site.

Weston & Sampson performed a series of subsurface investigations in 2022 to support proposed field improvements. These investigations identified approximately 6 to 12 inches of topsoil beneath the existing grass surface. Ash deposits and solid waste materials including glass, metal fragments, ceramics and wood were observed beneath the topsoil, generally intermixed with granular fill within the top few feet. These waste materials generally increased in prevalence with depth. Laboratory analytical samples of these materials were not collected as part of the subsurface investigations, however based on our experience with similar sites, it is believed that the soil and waste materials may be impacted with metals (lead, arsenic, chromium, etc.) and Polycyclic Aromatic Hydrocarbons (PAHs), commonly associated with ash deposits.

In light of the observations of soil with ash and waste materials and reported disturbance and stockpiling of surficial soils within the laydown area, Weston & Sampson mobilized to the Site to observe current conditions. The results of our reconnaissance and recommendations for additional actions are provided below.

Site Reconnaissance

On September 27, 2022, Weston & Sampson mobilized to the site to observe the laydown area and stockpiled materials. A photolog documenting conditions at the time of our reconnaissance is provided as Attachment A. The laydown area consisted of bare earth, surrounded by three-foot snow fencing on the southern side, and the existing chain-link fencing on the northern side along Central Avenue. An approximately 200 cubic yard stockpile site soil was observed adjacent to the entrance gate, which contained visible glass, brick, and metal fragments. These materials were considered to represent approximately less than 5% of the stockpile volume. The stockpile was not covered at the time of our Site visit. No ash or other evidence of waste materials was observed beyond the above.

Weston & Sampson contacted Mr. Paul Bunker of Revoli Construction to discuss the existing stockpile. Mr. Bunker indicated that the laydown area was recently cleared, with approximately one foot of surficial material (grass sod and topsoil) scraped to prepare the area. This material was stockpiled, with the intention of spreading it over the laydown area following construction to restore previous grades. Mr. Bunker estimated that the ongoing Central Avenue utility work would continue for approximately two months prior to restoration and turnover to the Town.

Recommendations

Based on the site history and our observations of the laydown area, we provide the following recommendations as a conservative measure:

- Install competent fencing to restrict public access to the laydown area (i.e., conventional construction fencing rather than the existing three-foot snow fence),
- Cover the soil stockpile to prevent migration of wind-blown dust and dermal contact,
- Prevent further excavation into the waste materials to minimize additional disturbance,
- Utilize dust control measures, potentially including wetting of the exposed soil surface during soil handling,
- Remove visible soil from truck tires prior to leaving the laydown area, and perform additional street sweeping, as needed, and,
- Following spreading of the stockpiled soil at the end of construction, place at least six inches of additional imported loam over the previously stockpiled soil prior to reseeding the area during the 2023 spring growing season.

Should you have any questions regarding the findings of this assessment, please contact the undersigned at (978) 532 – 1900.

Sincerely,

WESTON & SAMPSON ENGINEERS, INC.



Lee Koska, PE
Project Manager

Attachments:

Attachment A: Photolog



Photo 1. Stockpiled topsoil from laydown area.



Photo 2. Glass, metal debris observed in stockpiled topsoil.



Photo 3. Laydown area overview, stockpile indicated by red arrow.