

FINAL EVALUATION OF ALTERNATIVES
PERMITTING REQUIREMENTS

3.3.3 - e

MEMORANDUM

TO: Vladimir Lyubetsky, Principal
FROM: David M. Conway, P.E.
DATE: December 3, 2020
RE: Northeast Metro Technical High School-Permitting

PERMITTING-SCHEME C.3

Wetlands

The Wetlands Protection Act ensures the protection of Massachusetts' inland and coastal wetlands, tidelands, great ponds, rivers and floodplains. It regulates activities in coastal and wetland areas and contributes to the protection of ground and surface water quality, the prevention of flooding, and the protection of wildlife and aquatic habitat. Although the Wetlands Protection Act is a state law, it is administrated locally by the Town of Wakefield Conservation Commission.

Due to the size of the project and number of different wetland resources on, and adjacent to the site, an Abbreviated Notice of Resource Area Delineation (ANRAD) will be filed with the Wakefield Conservation Commission. An ANRAD is a permitting process where the limits and types of wetland resource areas are delineated with the conservation commission. The ANRAD process sets the wetland resource limits for three years and is useful as it allows full design to proceed with a clear delineation of the limits of the jurisdictional areas. For NEMT the ANRAD will be filed during the study phase and should be completed within two months of application submittal.

A preliminary wetland permitting timeline for the NEMT site assumes that an early site package for ledge removal work would be pursued in advance of the full building and site package. To accommodate an early site package a Notice of Intent (NOI) will need to be submitted for the work with the Wakefield Conservation Commission. The NOI is essentially the permit application to start the wetland permitting process and from submission to approval a typical timeline is approximately 3 to 4 months. For an early site package, the NOI will need to include erosion control and stormwater control measures that will have to be installed during, and remain in place after, the early site package work.

At the conclusion of the early site work a Certificate of Completion will need to be filed with and granted by the Wakefield Conservation Commission. The Certificate of Completion closes out the wetland permitting process and is typically required before any additional wetland permitting for the site is undertaken.

For the remainder of the building and site work a separate NOI will need to be filed, reviewed, and approved by the Wakefield Conservation Commission. The permitting timeline for the final NOI is expected to be 3-4 months from submittal to approval. For school building projects this NOI is typically submitted during the Construction Documents phase. This timing allows for the wetland permitting to be completed and not interfere with the construction schedule but is also late enough into the design process that the site design has been developed enough for peer review and public approval.

Utilities

Permitting for the required utility improvements consists of review and approval for the utility improvements with the Town of Wakefield Engineering Department. Review material would be submitted to the town for review and comment during the Construction Documents Phase. Review typically takes two weeks with an additional two weeks required to revise the drawings and address comments for a typical permitting time of one month from submission.

Massachusetts Environmental Policy Act (MEPA)

The Massachusetts Environmental Policy Act (MEPA) provides for public review and comment of projects that exceed certain environmental thresholds that have been established in the MEPA regulations. Typically, school replacement projects do not trigger MEPA review. During the Schematic Design phase, the project team would review the preferred project versus the thresholds to see if a MEPA notification is required.