GODDARD CONSULTING
Strategic Ecological Consulting

Notice of Intent

for

262C Loring Ave & 8 Harrison Rd
(Map 31, Lots 0001 & 0327)
Salem, MA 01970

DATE:
January 13, 2026

ADDRESSED TO:
Salem Conservation Commission
93 Washington Street
City Hall Annex, 2nd Floor
Salem, MA 01970

PREPARED BY:
Goddard Consulting LLC
100 Conifer Hill Drive, Suite 516
Danvers, MA 01923

PREPARED FOR:
AvalonBay Communities, Inc
600 Atlantic Avenue, 20th Floor
Boston, MA 02210

Winn Development LLC
One Washington Mall, Suite 500
Boston, MA 02108

January 13, 2026

Salem Conservation Commission
93 Washington Street
City Hall Annex, 2nd Floor
Salem, MA 01970

Re: Notice of Intent (NOI)
262C Loring Ave & 8 Harrison Rd
Salem, MA 01970
(Map 31, Lots 0001 & 0327)

Dear Salem Conservation Commission,

Goddard Consulting, LLC (Goddard) is pleased to submit this Notice of Intent on behalf of the applicants, AvalonBay Communities, Inc. and Winn Development LLC., for the properties known as 262C Loring Ave (Map 31, Lot 0001) and 8 Harrison Rd (Map 31, Lot 0327) in Salem, MA 01970. This Notice of Intent is for the proposed redevelopment of the property, known as the Salem State University South Campus, and includes the demolition of multiple existing residential structures and the construction of new, multi-family residential buildings, in addition to select existing buildings to be renovated and converted to multi-family residential occupancy. The site development includes new and renovated roadways, surface parking, parking garage, utilities, outdoor amenities, stormwater management, and a native landscaping plan. Portions of the work will be located within the 100-Foot Buffer Zone, 50-Foot Mitigation Zone, and 25-Foot No Disturb Zone to jurisdictional wetland resource areas. Work is also proposed within the 100-Foot and 200-Foot Riverfront Areas to the Forest River.

The applicant seeks an Order of Conditions that would allow for the construction of the proposed multi-family development and site amenities. This NOI application is a filing under the MA Wetlands Protection Act (WPA) and the Salem Wetlands Protection Ordinance, Chapter 50.

A list of enclosed documents is as follows:

- NOI Application (WPA Form 3)
- MassDEP NOI Wetland Fee Transmittal Form
- Affidavit of Service, Abutter Notification, Certified Abutters Lists
- Order of Resource Area Delineation, Salem Conservation Commission, 10/24/2024
- Wetland Border Report, Goddard Consulting LLC, 06/15/2023
    - Orthophoto of Locus Site, Goddard Consulting LLC, 05/25/2023
    - USGS Map of Locus Site, Goddard Consulting LLC, 05/25/2023
    - FEMA Flood Map of Locus Site, Goddard Consulting LLC, 05/25/2023
    - NRCS Soils Survey of Locus Site, Goddard Consulting LLC, 05/25/2023
- *Salem State South Campus Redevelopment*, Weston & Sampson Engineers, Inc. 01/08/2026
- *Forest River Residences*, Weston & Sampson Engineers, Inc. 01/22/2026
- *Stormwater Report,* Weston & Sampson Engineers, Inc. 01/08/2026

If you have any questions, please feel free to contact Goddard Consulting LLC at (508) 393-3784.

Sincerely,
Goddard Consulting, LLC

Andrew Thibault, WPIT, WSA
Environmental Scientist

Michael Schmidt
Wetland Scientist

1.0 Existing Conditions

The site consists of two parcels of land totaling approximately 23.003 acres. The subject properties, 262C Loring Avenue (Map 31, Parcel 0001) & 8 Harrison Road (Map 31 Parcel 0327), are known as the Salem State University South Campus. The subject site is primarily developed, consisting of 6 four-story dormitories, academic buildings, and extensive parking. The site is accessed via Harrison Road, connecting to an existing paved parking lot in the center of the property. The property is bounded by Loring Road to the Southeast, East, and Northeast. The surrounding area is a developed residential area containing primarily single-family homes to the Northwest, North, and Northeast. Undeveloped land known as the Forest River Conservation Area abuts the property to the west.

1.1 RESOURCE AREAS ON-SITE

The Forest River, a tidal perennial river, runs through the property to the Southwest. The river outlets to Salem Harbor, and is surrounded by an extensive salt marsh, which constitutes the majority of wetland resource area present on the parcel. Salt marsh extends upgradient from the Forest River, transitioning into a narrow Bordering Vegetated Wetland (BVW) system adjacent to the developed uplands on-site. Additionally, an Isolated Vegetated Wetland (IVW) was delineated upgradient to the north of the Forest River, adjacent to the existing dorm buildings. The IVW consists of a shallow depression situated between the existing residential buildings and walking trails that lead to the Forest River Conservation Area to the west. The area was delineated as a closed basin, with no surface water connections to the remaining resource areas on-site. The immediate land areas surrounding this isolated system are disturbed, consisting of a grassed slope and adjacent walking trail.

In preparation of the project, the wetland resource areas present on the subject property have been previously delineated and confirmed through the issuance of an Order of Resource Area Delineation (ORAD). An Abbreviated Notice of Resource Area Delineation (ANRAD) was filed on June 15, 2023, for the full extent of the property known as the Salem State South Campus, consisting of 262C Loring Avenue and 8 Harrison Road, with the Salem Conservation Commission. The ANRAD application was filed to confirm all jurisdictional resource areas on-site under the Massachusetts Wetland Protection Act, the Salem Wetlands Protection Ordinance, and to confirm all jurisdictional buffers cast not the property. An Order of Resource Area Delineation (ORAD) was issued by the Commission on September 3, 2024, confirming the limits of all wetlands on-site, and all subsequent jurisdictional buffer zones.

According to the MassGIS data layers for NHESP, the property is not located within any Estimated Habitat of Rare Wildlife / Priority Habitat of Rare Species. No potential or certified vernal pools are mapped within the site. The site is not located in an Area of Critical Environmental Concern (ACEC) or an Outstanding Resource Waters (ORW) Area. Portions of the property in its southern reaches are mapped within FEMA Flood Zone AE for 1% Annual Chance of Flooding associated with the Forest River.

Photo 1: An aerial overview of the project site displaying existing development

1.1.1 Bordering Vegetated Wetland (BVW)

Massachusetts WPA Regulations define Bordering Vegetated Wetlands as "freshwater wetlands which border on creeks, rivers, streams, ponds and lakes. The types of freshwater wetlands are wet meadows, marshes, swamps, and bogs. Bordering Vegetated Wetlands are areas where the soils are saturated and/or inundated such that they support a predominance of wetland indicator plants. The ground and surface water regime and the vegetational community which occur in each type of freshwater wetland are specified in M.G.L. c. 131, § 40."

Bordering Vegetated Wetlands have previously been identified in the southern portions of the site. The BVW was confirmed and approved under the site's ORAD. Referred as the A-Series wetland on the attached civil site plans, this system consists of a narrow freshwater wetland system occurring on the outer edge of a salt marsh that extends to the banks of the Forest River. The eastern portions of the system run up to the vegetated slopes that occur along the existing parking areas. The western portions run up similar slopes before transitioning into an upland forested area containing walking paths associated with the Forest River Conservation Area, behind the existing dorm buildings.

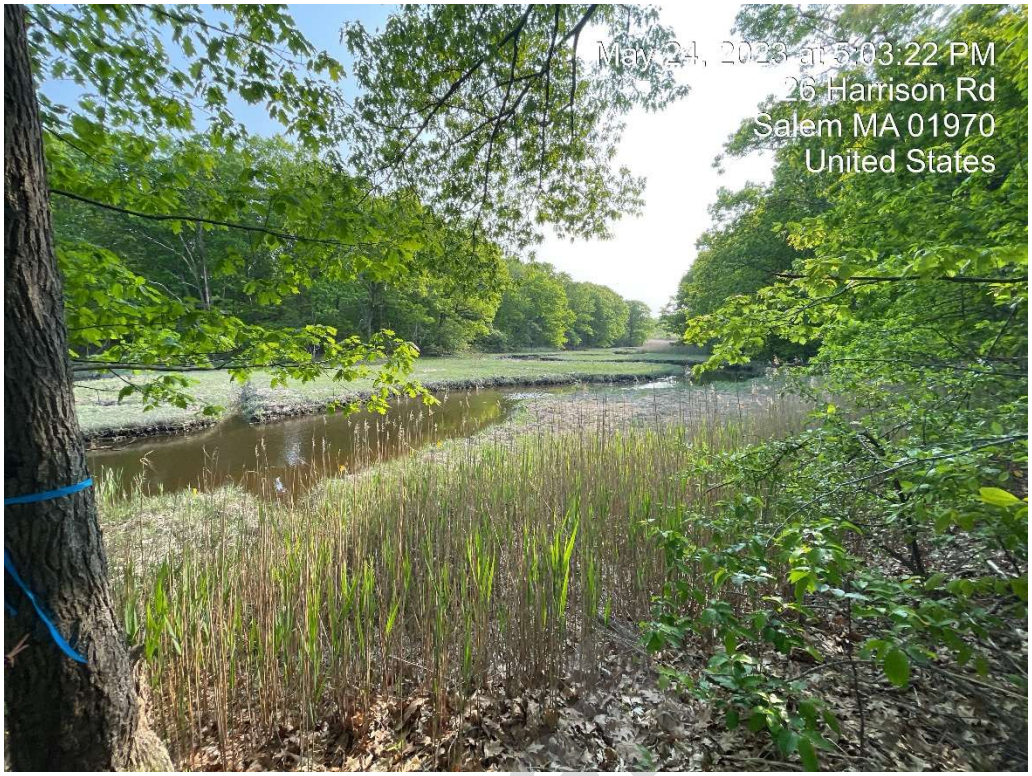

Photo 2: A view of the western portion of the A-Series BVW, with internal salt marsh and Forest River in the background

Photo 3: A view of the eastern portion of the A-Series BVW and internal salt marsh. The existing "Harrington Building" is visible

1.1.2 Isolated Vegetated Wetlands (IVW)

Massachusetts WPA regulations do not provide a formal definition for Isolated Vegetated Wetlands as they are not regulated under the WPA. The City of Salem's Wetlands Protection Ordinance 50-5 defines IVW as "wetlands which meet the MassDEP manual entitled "Delineating Bordering Vegetated Wetlands under the Massachusetts Wetlands Protection Act" (1995 and as may be amended from time to times) with respect to the delineation standards for soils, hydrology, and vegetation, are at least 750 square feet in size or greater, but do not require connectivity to surface waters."

An Isolated Vegetated Wetland (IVW) was previously identified in the western portion of the site, confirmed and approved under the site's ORAD. The IVW, referred to as the B-Series wetland, is a shallow depression at the base of slopes running down from the existing dorm buildings. The wetland is approximately 3800sf in area, surpassing the threshold for jurisdictional status laid out in Salem's Wetlands Protection Ordinance. As can be seen in the photos below, the land areas immediately adjacent to the IVW are disturbed, consisting of grassed slopes downgradient of the dorm buildings, as well as a walking trail seen at the edges of the photo.

Photo 4: A view of B-Series IVW, located between the existing dorms and the conservation area path

1.1.3 Bank

Bank is defined as "the portion of the land surface which normally abuts and confines a water body." Bank is located within the project site along the Forest River. The Forest River is a perennial, tidal river that runs out to Salem Harbor. The river travels through the salt marsh internal to the A-Series wetland boundary, creating a defined, winding channel through the marsh. The northern bank of the river was flagged and is referred to as the C-Series wetland boundary. The bank was previously reviewed and approved under the site's ORAD to capture the extent of Riverfront Area on the project site.

Photo 5: A view of the Forest River from the eastern edge of the site, facing West

1.1.4 Land Under Water Bodies and Waterways (LUWW)

Massachusetts WPA Regulations define Land Under Water Bodies and Waterways 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 LUWW associated with the Forest River channel consists of a mucky, natural streambed.

1.1.5 Bordering Land Subject to Flooding

Bordering Land Subject to Flooding (BLSF) is defined as "an area which floods from a rise in a bordering waterway or water body. Such areas are likely to be significant to flood control and storm damage prevention." Portions of the site fall within FEMA Flood Zone AE for 1% Annual Flood Hazard with a Base Flood Elevation of 10ft. As such, all land at 10ft or below in this area is considered BLSF. All BLSF on site occurs to the west, outside of existing developed areas, in the lands inclusive of and adjacent to the Forest River.

1.1.6 Riverfront Area

The Mean Annual High-Water (MAHW) line of the Forest River coincides with its bank, and was additionally delineated, surveyed, and approved under the site's ORAD. This stream is identified as perennial by the USGS map for the area (attached). Massachusetts WPA Regulations define the Riverfront Area 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." The Riverfront Area extends from the MAHW of the Forest River across both the A-Series and B-Series wetlands, the surrounding forested uplands, and onto the outer edges of the site's developed portions, inclusive of existing buildings, paved surfaces, and landscaped areas.

1.1.7 100-Foot Buffer Zone, 50-Foot Mitigation Zone, and 25-Foot No Disturbance Zone

Massachusetts WPA Regulations define Buffer Zone as "100-ft area horizontally (on a true lateral) landward of approved delineation of applicable wetland resource areas." The WPA further states that any activities undertaken within 100 feet of an area specified in 310 CMR 10.02(1)(a) (e.g., Bank, Bordering Vegetated Wetland) will be conducted per (310 CMR 10.02(2)(b)), "in a manner so as to reduce the potential for any adverse impacts to the resource area during construction, and with post-construction measures implemented to stabilize any disturbed areas." The City of Salem, through the Salem Wetlands Protection Ordinance, Chapter 50, includes IVW and Bordering Land Subject to Flooding as resource areas with jurisdictional Buffer Zones in addition to the WPA standards.

The City of Salem implements additional buffers within the 100-Foot Buffer Zone under Chapter 50, Section 8. A 50-Foot Mitigation Zone, defined as "the first 50-feet within the buffer zone extending from an applicable resource area in which disturbance is prohibited without adequate mitigation as determined by the Conservation Commission", and a 25-Foot No Disturbance Zone, defined as "the first 25-feet within the buffer zone extending from an applicable resource area in which virtually no activities or work, other than passive passage, stormwater outfall components, and utilities, are permitted"

As outlined above, all jurisdictional wetland resource areas have been previously reviewed and confirmed under the site's ORAD, with associated Buffer Zones. The attached site plans display the limits of the approved 100-Foot Buffer Zones, 50-Foot Mitigation Zones, and 25-Foot No Disturbance Zones on-site.

100-Foot Buffer Zones are cast from the edge of the A-Series BVW, B-Series IVW, and BLSF onto the site. 50-Foot Mitigation Zones and 25-Foot No Disturbance Zones are cast from the A-Series and B-Series wetlands. Due to the developed nature of the site, much of the work as designed will be located outside of jurisdictional buffers, and within land that has been previously disturbed and developed. Compliance with work within each jurisdictional buffer zone is outlined within this application.

2.0 Project Summary

As outlined above, the proposed project consists of a redevelopment of the Salem State University South Campus, known as 262C Loring Avenue (Map 31, Parcel 0001) & 8 Harrison Road (Map 31 Parcel 0327). The project development will occur as a collaborative partnership between the applicants, AvalonBay Communities, Inc. and Winn Development LLC, leading to a shared redevelopment of the property. The proposed project will be subdivided into four lots, with Lot 1 (9.4 acres) under the control of AvalonBay, Lots 2 and 3 (totaling 8.497 acres) under the control of Winn Development. Lot 4 (remaining 5.106 acres) will consist of Conservation land and will not be developed as part of the project.

As the campus will no longer be utilized by the university, the project intends to redevelop the property to convert the development to multifamily use. To accomplish this, the project incorporates both the renovation and remodeling of existing buildings on-site to convert their use, as well the construction of multiple new multi-family residential buildings. The project proposes a redevelopment of the northwest portion of the site through the demolition of the Bates Housing Complex, including the existing dormitory buildings. The demolition will be followed by the construction of a four-story, 340-unit multi-family residential building with an integrated parking garage. The new building will be located primarily within the footprints of existing structures, paved areas, and maintained lawn, with associated walkways and utility upgrades. An additional new multi-family development, referred to as the "Harrison" building, is proposed in the center of the site, east of the existing "Harrington" building. Renovations are proposed to the "Harrington" building, and the remaining existing structures to the southeast known as the "Academic" and "Alumni House" buildings. These will be converted to multi-family residential buildings.

The subject site is and will continue to be serviced by town water, sewer, electrical, telecom, and gas following the removal and replacement of existing utility infrastructure internal to the site. Site preparation will also include the removal and replacement of existing paved parking, driveways, walking surfaces, as well as improvement to the site with new amenities, stormwater management, and an extensive native landscaping plan. Portions of the work will be located within the 25-Foot No Disturb Zone, the 50-Foot Mitigation, and the 100-Foot Buffer Zone to Vegetated Wetlands. Work is also proposed within both the 100-Foot and 200-Foot Riverfront Areas to the Forest River. Lastly, work is proposed within the 100-Foot Buffer to Bordering Land Subject to Flooding.

The majority of the work will occur over existing developed areas, allowing the footprint of the project to be minimized to the extent practicable to achieve the intended design. Detailed information on all components of the project, including locations and regulatory jurisdiction, are outlined below. As will be seen below, the project has been designed to result in a net decrease in the total impervious surface coverage on the property, while providing stormwater and landscaping improvements throughout.

2.1 Proposed Four-Story Multifamily Building with Integrated Parking Garage

The existing dormitory buildings in the northwest of the site will be demolished and removed. In their place, the project proposes a four-story multi-family residential building, containing 340 units and an integrated parking garage. The new structure will be located over the footprints of the removed structures, paved surfaces associated with the existing development, and areas currently maintained as lawn or landscaping. New walkways and upgraded utilities will be installed throughout the area.

The southern edge of the proposed building falls within buffer zones to wetland resource areas. Part of the structure extends into the 100-foot Buffer Zone of the B-Series IVW. It is set farther from the IVW than the existing residences and remains entirely outside the 50-foot Mitigation Zone. Another portion lies within the 200-foot Riverfront Area of the Forest River. The structure is proposed atop the footprint of current residential buildings, paved areas, and landscaped lawn. At its closest point, the new building will be about 170 feet from the river, greater than the existing structures, which sit roughly 150 feet from the MAHW line. Additionally, part of the building extends into the 100-foot

Buffer Zone to Bordering Land Subject to Flooding. This section, located approximately 85 feet from the boundary, is planned over areas already maintained as lawn and pavement.

2.2 Proposed "Harrison" Residential Building and Renovations of Existing Campus Buildings

A second new multi-family residential building, referred to as the "Harrison" building, is proposed atop the existing parking lot currently associated with the existing "Harrington" building. This work is located entirely outside of any jurisdictional buffer zones.

The existing buildings that are to remain will be renovated and converted for multi-family residential use. New walkways and upgraded utilities will be installed throughout the area. All work involving the "Academic" building is outside of jurisdictional buffer zones. Small portions of the "Alumni House" and its surrounding amenities currently exist within the 100-Foot Buffer Zone to BLSF. The western portion of the "Harrington" building and its amenities are within the 200-Foot RFA and 100-Foot Buffer Zone to the A-Series wetland and BLSF. The buildings will remain unchanged, and all proposed walkways and utility improvements will occur within existing development.

2.3 Proposed Surface Parking

The majority of the proposed surface parking improvements will involve the removal and resurfacing of existing lots. At present, surface parking occurs throughout the site, with multiple large lots existing at the site's center, southwestern edge, and southeastern corner. With the addition of the parking garage, the large central lot will largely be removed, with a small portion along the north building being resurfaced as parking. The southeastern lot and surrounding surfaces will be removed and resurfaced in their existing locations as parking for the renovated "Academic" and "Alumni House" residential buildings. The existing lot to the east of the existing "Harrington" building will be removed, with a portion being redeveloped as parking for the proposed "Harrison" residential building.

The majority of the proposed parking surfaces are located outside of the site's jurisdictional buffer zones, however, portions of the existing lot along the southwestern edge currently lie within the 100-Foot Buffer Zone, 50-Foot Mitigation Zone, and 25-Foot No Disturb Zone to the A-Series wetland, the 100-Foot Buffer Zone to Bordering Land Subject to Flooding, the 200-Foot and 100-Foot Riverfront Areas to the Forest River. All proposed parking surfaces within jurisdictional buffer zones involve resurfacing of existing paved areas and will not encroach any closer to the resource areas than present. Stormwater management systems are proposed throughout the site to ensure that runoff is reduced, quality of runoff is improved, and the buffers and riverfront areas are improved over existing conditions, which is described in further detail below.

2.4 Roads and Driveways

Existing roadways and driveways are proposed to be removed, resurfaced, and reconfigured throughout the site. Harrison Road will be resurfaced in its current configuration. This will lead to the new driveway that runs to the northern residential building and the southwestern parking lots. This driveway will run through what currently exists as a large central parking lot, proposed to be removed. Two emergency access roads will be constructed around the north residential building: one along the eastern side, and the other to the west. The western access road will utilize a porous pavement, as opposed to standard bituminous concrete used elsewhere throughout the site in an effort to minimize impervious surface cover adjacent to the delineated resource areas. An existing driveway which runs from Loring Ave to the southeastern parking lot and associated buildings, referred to as the Upper Campus Access Road, will be resurfaced, remaining in its current configuration. The western portion of the main driveway is proposed within 100-Foot Buffer Zones to resource areas and the 200-Foot RFA to the Forest River. The driveway is proposed over existing paved surfaces and is not proposed any closer to resource areas than existing surfaces.

The western emergency access road is proposed within the 25-Foot No Disturb Zone, 50-Foot Mitigation Zone, and 100-Foot Buffer Zone to the B-Series IVW and the 200-Foot RFA to the Forest River, atop the footprint of existing structures and areas that currently exist as maintained lawn and landscaping. A small portion will require removal of some mature vegetation within the 200-Foot RFA, however the majority of the work area occurs over the limits of maintained surfaces. As discussed, the land area immediately surrounding the IVW consists of maintained lawn adjacent to the existing dorms, and a walking trail immediately abutting the wetland edge. The construction of this road in the proposed configuration is necessary to provide emergency access to the rear of the building. As mentioned above, a porous pavement is proposed where feasible within this roadway to limit the impervious surface coverage. Additional mitigation in the form of stormwater management and native plantings is also proposed, which is described in greater detail below.

2.5 Proposed Outdoor Amenities

The project proposes multiple outdoor amenities interior to the development, sited between the proposed multi-family buildings and parking lots. As seen on the attached site plans, a courtyard is proposed interior to the eastern section of the north residential building. A second courtyard is proposed at the front of the western section of the north residential building. A large central common area is proposed in the center of the site, atop the existing parking lot. Stone dust walking paths are proposed through the forested and landscaped areas between the southern buildings. Each of the proposed outdoor amenities is included in the landscape planting plan.

The western courtyard of the north residential building is partially located within 100-Foot Buffer Zone to the B-Series IVW and the 200-Foot RFA to the Forest River, and proposed atop existing building footprints, walkways, and landscaped areas. The western edge of the central common area is partially located within the 100-Foot Buffer Zones to the A-Series wetland, B-Series Wetland, and BLSF. The Common Area is proposed atop the paved and landscaped surfaces of the existing parking lot. The southernmost walkway, between the Harrington building parking lot and Alumni House building, runs through the 200-Foot RFA and 100-Foot Buffer Zone to BLSF.

2.6 Subsurface Stormwater Management

The proposed project converts much of the existing impervious parking and traffic areas to hardscaped and landscaped areas, resulting in a net decrease in impervious coverage across the site. To provide additional improvements to the site and ensure that resources areas and their buffer zones are improved, extensive stormwater management is also proposed throughout. The project proposes upgrades to existing drainage infrastructure and runoff treatment through the implementation of deep sump hooded catch basins, hydrodynamic separators, four subsurface infiltration systems, and porous pavement along the western emergency access road. A full Stormwater Report report has been prepared by Weston & Sampson Engineers, Inc. is included as part of the Notice of Intent submittal which details compliance with all applicable performance standards. All proposed stormwater management measures have been designed to be in full compliance with the Massachusetts Department of Environmental Protection (MassDEP) Stormwater Management Standards and the City of Salem's Rules & Regulations and Stormwater Management Program (SWMP).

2.7 Erosion Control Measures

The applicant proposes robust Erosion Control Barriers (ECBs) in the form of entrenched silt fence and compost filter tubes along the limit of work to protect the wetland resource areas downgradient of proposed construction from sedimentation generated from within the work area. Silt sacks will be installed at each catch basin before work commences. Due to the gradual grades on across the project site, Goddard anticipates very low risk of sedimentation generated by the proposed construction. A construction entrance will be established to reduce the transport of sediment off-site by construction vehicles. Erosion control blankets are proposed as additional stabilization measures for any exposed slopes greater than 4H:1V. During construction, a Stormwater Pollution Prevention (SWPPP) will be implemented and adhered to during the entire duration of construction. All disturbed areas of soil will be permanently stabilized.

2.8 Proposed Landscaping

As outlined on the attached site plans (sheets L300-L304 of each plan set), the project proposes a robust landscaping plan, including the installation of native deciduous trees, evergreen trees, shrubs, and wildflowers throughout the property. The planting schedule can be seen on sheet L300 of each plan set, detailing species, quantity, size, and spacing for all proposed plantings. In total, the landscape planting plan proposes 118 trees, 453 shrubs, and a variety of groundcover mixes as appropriate per area. All proposed trees are in line with the Salem Tree Manual List of Approved Species. The native landscaping plan allows the project to reduce total impervious surface coverage across the project site by increasing green spaces and planted areas.

3.0 Regulatory Compliance

This section will outline the compliance of the proposed project with both the Wetlands Protection Act, as well as with the performance standards of the Salem Wetlands Protection Ordinance, Chapter 50. Due to the presence of resource areas within the southwestern sections of the property, portions of the proposed project will occur within the 100-Foot Buffer Zone to protected resource areas, and within the 100-Foot and 200-Foot Riverfront Areas to the Forest River. Work is additionally proposed within additional Buffers established under the city's ordinance, including the 50-Foot Mitigation Zone and 25-Foot No Disturb Zone, minimized to the extent practicable, with mitigation efforts provided. The project has been designed to be located outside of these buffers to the maximum extent feasible. Regulatory compliance for Buffer Zone Alteration (310 CMR 10.02(2)(b)), Riverfront Redevelopment (310 CMR 10.58(5)), and the local wetland bylaw performance standards are outlined below.

3.1 100-Foot Buffer Zone – Under The WPA

The WPA Regulations do not contain performance standards for Buffer Zone Alteration (310 CMR 10.02(2)(b)). All reasonable efforts to avoid, minimize and mitigate adverse impacts on the Buffer Zone have been considered. However, 310 CMR 10.53(1) outlines general provisions for work proposed within the buffer zone to jurisdictional resource areas. Such provisions include the scope of the work within the buffer zone, defining a limit of work, assessing slopes, grading, and potential for erosion, and the preservation of natural vegetation upgradient of the wetland edge (though no specific performance standards are defined). All reasonable efforts to avoid, minimize, and mitigate adverse impacts on the Buffer Zone have been considered with the proposed project.

As shown on the attached plan set, the majority of the project's footprint, including work within the 100-Foot Buffer Zone, is proposed to be located over the limits of existing developed and maintained surfaces, and requires minimal disturbance of presently undisturbed areas or removal of native vegetation. Due to the developed nature, the site is generally flat, minimizing erosion risks associated with the development. The project proposes robust Erosion Control Barriers (ECBs) in the form of entrenched silt fence and compost filter tubes along the limit of work to protect the BVW and Riverfront resource areas downgradient of proposed construction from sedimentation generated from within the work area. Silt sacks will be installed at each catch basin upon construction. Erosion control blankets are proposed as additional measures for work involving steeper slopes. A landscaping plan has been proposed, comprised of native trees, shrubs, and groundcover mixes. The project results in a net decrease in impervious surface coverage, and the proposed stormwater management measures, including upgrades to the sites drainage infrastructure and new subsurface infiltration systems, will help to reduce the runoff generated and improve the quality of water that leaves the site.

3.2 Riverfront Area – Under the WPA

The project proposes redeveloping existing structures and degraded surfaces within RFA on site. The project will be required to comply with Redevelopment Within Previously Developed Riverfront Area Standards under 310 CMR 10.58(5). The total Riverfront Area on the project is approximately 331,000 SF. The project has been designed to fully comply with all performance standards under 310 CMR 10.58(5) by avoiding encroachment closer than existing conditions, and resulting in an overall benefit to the property through mitigating efforts and the reduction of impervious surface coverage. The table below outlines compliance with all applicable performance standards.

310 CMR 10.58(2)	**Riverfront Area (RFA)** 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 10.58(2)2c: In tidal rivers, the mean annual high-water line is coincident with the mean high water line determined under 310 CMR 10.23.	
Performance Standards		**Compliance**
10.58(5)(a)	*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, improvement of existing roads, or reuse of degraded or previously developed areas. A previously developed riverfront area contains areas degraded prior to August 7, 1996 by impervious surfaces from existing structures or pavement, absence of topsoil, junkyards, or abandoned dumping grounds. Work to redevelop previously developed riverfront areas 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 § 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 areas within RFA in which work is proposed were developed prior to 1996. As such, redevelopment of these areas is allowable provided that the work results in an overall improvement over existing conditions with respect to the interests of the Act. In full compliance, the project has been designed to redevelop the developed portions of the site within the Riverfront Area, while providing overall improvements to the property and the capacity of the Riverfront Area to protect the interests of the Wetlands Protection Act. The project will result in an overall net decrease in impervious surface coverage on the property and will not increase the coverage of impervious surfaces within the Riverfront Area. The project proposes stormwater management improvements to the site, including upgrades to the site's drainage infrastructure and the installation of subsurface infiltration chambers. These upgrades will reduce total runoff generated by the site's impervious surfaces and will improve the quality of water leaving the site. A full drainage report has been provided by the project's civil engineers, Weston & Sampson, detailing all stormwater improvements made to the property. In addition to the stormwater improvements, native trees and shrubs will be planted throughout the redeveloped RFA as part of the site's overall landscaping plan, providing additional native plantings within currently developed surfaces.

10.58(5)(b)	*(b) Stormwater management is provided according to standards established by the Department.*	Stormwater management is proposed across the site. Upgrades will be made to existing drainage infrastructure, and treatment of runoff will occur through the implementation of deep sump hooded catch basins, hydrodynamic separators, four subsurface infiltration systems, and porous pavement along the western emergency access road. A full drainage report has been provided by the project's civil engineers, Weston & Sampson, detailing all stormwater improvements made to the property.
10.58(5)(c)	*(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, or not closer than existing conditions*	No work is proposed closer to the river than existing conditions. Currently, portions of existing parking surfaces are located approximately 55ft from the Forest River. This limit of impact determines the allowable limits of work under the redevelopment project, meaning that no work can be sited beyond this existing limit. In full compliance, this limit of work has been maintained in the design of the project. Proposed work within the 100-Foot RFA is limited to the resurfacing of these paved surfaces, and the upgrades to the subsurface utilities that will result in an improvement over existing conditions. Some minor grading will occur at the southeast corner of the southwestern parking lot and the western edge of the west Emergency Access Road to create gradual slopes that direct runoff away from the resource area, and will not encroach closer than existing conditions.
10.58(5)(d)	*(d) Proposed work, including expansion of existing 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 majority of the project is located outside of jurisdictional buffers, including the Riverfront Area boundaries. Work within the RFA is proposed atop existing developed surfaces and building footprints and in most cases does not extend any closer to the resource area than present conditions. The north residential building is set back farther than the existing residential structures.
10.58(5)(e)	*(e) The area of proposed work shall not exceed the amount of 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 area of proposed work shall not exceed the amount of degraded area, in compliance with 310 CMR 10.58(5)(e). The project does not propose to move any closer than existing conditions and does not add additional impervious surface coverage to the project site. The project has been designed to reduce overall impervious surface coverage, while providing mitigating efforts through stormwater and landscaping improvements. As a result, the project does not require compliance with 310 CMR 10.58(5)(f) or (g).

3.3 50-Foot Mitigation Zone

The City of Salem, through the Salem Wetlands Protection Ordinance, regulates the first 50-ft from a protected resource area, in which no disturbance is permitted without adequate mitigation.

Work within the 50-Foot Mitigation Zone will include portions of the west emergency access roadway, portions of the north building's west courtyard, and utility/drainage improvements. Portions of the southwest parking lot, which is proposed to be resurfaced, also exist within the mitigation zone.

Through the redevelopment of the existing surfaces and structures on site, the project results in an overall decrease in impervious surfaces over the present conditions. The project proposes mitigation in the form of stormwater management improvements to the site, including upgrades to the site's drainage infrastructure and the installation of subsurface infiltration chambers. These upgrades will reduce total runoff generated by the site's impervious surfaces and will improve the quality of water leaving the site, ensuring that the buffers to resource areas and resource areas themselves are improved over existing conditions. Lastly, the redevelopment includes multiple outdoor amenities in the form of large common areas, courtyards, and walking paths that will be maintained as pervious, green spaces. These areas, and the surrounding development, will be planted with native trees, shrubs, and groundcover to provide greater habitat on the lot than current conditions allow.

Erosion Control Barriers in the form of entrenched silt fence and compost filter tubes are proposed along the limit of work to protect the BVW and Riverfront resource areas downgradient of proposed construction from sedimentation generated from within the work area while construction is underway.

3.4 25-Foot No Disturbance Zone

The City of Salem regulates the first 25ft within the Buffer Zone of a protected resource area, in which no alteration is generally permitted. The regulations provide limited exclusions for certain projects that result in an improvement to the area. Section 6.A.1.i of the regulations states:

"The intent of the 25-foot No Disturbance Zone is that no alterations, other than activities that improve the character of this Zone with regard to its contribution to the associated resource area's ability to maintain the Ordinance values, shall be allowed other than as may be described in the Ordinance or elsewhere herein."

The west emergency access road is necessary to provide access for emergency vehicles to the rear of the proposed building. The roadway is proposed atop the footprint of existing buildings and maintained lawn and is not intended to impact any undeveloped or naturalized portions of the No Disturbance Zone.

All other work within the No Disturbance Zone consists of the resurfacing of existing paved surfaces. The work will allow for improved utilities and drainage infrastructure to be installed and provide an overall improvement to the buffer and associated resource areas.

ECB in the form of entrenched silt fence and compost filter tubes are proposed along the limit of work to protect the BVW and Riverfront resource areas downgradient of proposed construction from sedimentation generated from within the work area while construction is underway.

3.5 Climate Change Adaptation and Mitigation

To satisfy the resource area values defined in the Ordinance related to climate change, the Salem Conservation Commission requires that climate change adaptation and mitigation be addressed as part of any Notice of Intent. The criteria and responses provided are summarized below.

1. *Describe project design considerations which address storm and flood damage, including the potential for potential future flood damage.*

The subject site is adjacent to the Forest River and lies within FEMA Flood Zones AE. As such, it is vulnerable to storm and flood damage. Based on the City of Salem's Flood Predictions and an independent Flood Mitigation Study by Weston & Sampson, the estimated 2070 Sea Level Rise Base Flood Elevation (SLR BFE) is 13.8 (NAVD88), or 3.8-feet higher than the current 10ft BFE. This projected SLR BFE is shown on the provided plan set and has been factored into the design of the site and structures. New structures have been designed with a finished floor elevation of 16ft or higher. In addition, improved grading, drainage infrastructure, and stormwater management systems, and a reduction in impervious surface cover on the property will assist to reduce the impacts of severe storm and flood events.

2. *Describe how the project accounts, to the maximum extent practicable, for potential future increases in stormwater runoff (increased frequency and intensity of storm events), and how best management practices account for storm surges and extreme weather events anticipated due to climate change.*

To reduce the impact of severe storms, stormwater management systems and drainage infrastructure improvements are proposed throughout the site. Best Management Practices to be implemented include deep sump hooded catch basins, hydrodynamic separators, four subsurface infiltration systems, and porous pavement along the western emergency access road. These systems have been designed to tolerate up to 100-year storm events per the NOAA Atlas 14 precipitation frequency estimates. A complete Stormwater Report has been prepared by Weston & Sampson which details compliance with all applicable performance standards is included as part of the Notice of Intent submittal.

3. *Describe planting plans and other measures such as limiting increases in impervious surface cover to maintain and enhance the resiliency of the resource area(s) to withstand potential temperature and rainfall changes due to climate change, as well as Sea Level Rise.*

The project results in a net decrease in impervious surface coverage across the site, which will improve the site's resiliency against intense rainfall events. Some existing paved surfaces, such as the large central parking lot, are to be replaced with landscaped common areas and planted with native trees and shrubs. Similarly, surfaces such as the western emergency access road utilize porous pavers within the design to retain infiltration and limit impervious surface cover. Additional native plantings are proposed across the project site, as shown in the landscape plans.

4. *Describe measures to protect proposed and existing structures and minimize damage to structures due to the impacts of climate change.*

New structures will be located well above the projected BFE on site due to sea level rise. Based on the City of Salem's Flood Predictions and an independent Flood Mitigation Study by Weston & Sampson, the estimated 2070 Sea Level Rise Base Flood Elevation (SLR BFE) is 13.8 (NAVD88), or 3.8-feet higher than the current 10ft BFE. This projected SLR BFE is shown on the provided plan set and has been factored into the design of the site and structures. New structures have been designed with a finished floor elevation of 16ft or higher. Additionally, improvements to the site's

drainage infrastructure will help to protect both new and existing structures from flood and storm damage, while helping to improve the quality of water leaving the site.

5. *Any vegetated wetland impacts proposed within areas also situated within Land Subject to Flooding or Coastal Storm Flowage shall be mitigated at a 2:1 ratio and shall be located within the same reach of the mapped flood zone area. Impacts allowed within said resource areas shall be at the discretion of the Conservation Commission's findings that the resource area values of the Ordinance are not adversely affected by the project.*

The project does not propose any direct impacts to vegetated wetlands. Work is proposed within the 25-Foot, 50-Foot, and 100-Foot Buffer Zones to vegetated wetlands and BLSF. The project has been designed with sensitivity to the resource areas and has been designed to minimize and avoid impacts to the extent feasible by working within developed and maintained surfaces on the project site. Erosion Controls in the form of entrenched silt fence and compost filter tube will be installed upgradient of all resource areas to prevent sediment migration beyond the limit of work. Improvements through stormwater management and native landscaping ensure the impacted buffer zones are improved over existing conditions.

4.0 Conclusion

In summary, Goddard Consulting believes that the proposed project will not have any adverse impacts on the interests identified in the Wetlands Protection Act or the Salem Wetlands Protection Ordinance. The project has been designed with sensitivity to the resource areas on site and has been designed to minimize and avoid impacts to the extent feasible by working within developed and maintained surfaces on the project site. No work is proposed directly within any resource area, and the project has been designed to comply with all performance standards outlined for work within the 100-Foot Buffer Zone, 100- and 200-Foot Riverfront Areas, and The Salem Wetlands Protection Ordinance. Through the siting of the project over maintained and developed surfaces, the implementation of stormwater management, and planting of native vegetation, the project seeks to maintain and improve the conditions of the site through the post-construction conditions of the project. The project has been designed to adhere to performance standards outlined at the state and local levels. Therefore, Goddard Consulting respectfully requests that the Salem Conservation Commission issue an Order of Conditions approving the proposed project.

Sincerely,
Goddard Consulting, LLC

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