



IPSWICH RIVER  
WATERSHED  
ASSOCIATION

*The Voice of the River*

P.O. Box 576  
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December 12, 2023

Town of Hamilton Planning Board  
Town Hall  
577 Bay Road  
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Hamilton, MA 01936  
[preffet@hamiltonma.gov](mailto:preffet@hamiltonma.gov)

By Email: Re: Hamilton Wenham School District Athletic Field Project on Bay Road

To Chair Crouch and the Hamilton Planning Board,

We are writing to provide comment on the proposed Hamilton Wenham School District's Athletic Field Project on Bay Road currently before the Board.

As you are aware, the project site is near the Miles River and adjacent to an unnamed creek that flows directly into the river. The Miles River is currently suffering from a series of anthropologic impacts including stormwater runoff, poor water quality, water extraction, the presence of invasive species, and hydrological alteration. As such, the Ipswich River Watershed Association is particularly concerned about development along the river and its tributaries, and subsequent impacts on the watershed.

We are writing specifically with regards to the proposed project's stormwater systems. While the proposed below-grade stormwater management systems satisfies the regulations on paper, practical experience has shown us that the necessary and critical long-term management of these systems rarely, if ever, occurs as proposed and therefore these systems fail over time. For example, a recent survey of all the stormwater Best Management Practice (BMP) installations conducted by the Greenscapes Coalition in the 28 Greenscapes member communities (including in Hamilton) found that virtually all of the BMPs in the region are not currently being maintained properly and no longer function as designed. In other words, it is a virtual guarantee that the proposed system will suffer from the same fate without adequate conditions.

Therefore, the Planning Board should not permit the proposed BMP without such safeguards in place. Additionally, because the proposed BMPs are subject to clogging over time, the Board should require a reduced efficiency factor be included in the stormwater calculations to ensure that they meet the required standards over time.

We recommend the following conditions for BMPs, such as those proposed for this project:

- The Board should require the posting of a bond in an amount sufficient to pay for the regular inspection and rehabilitation of the proposed stormwater systems for the anticipated life expectancy of the athletic facilities.
- Although the proposed underground BMPs are meant to treat and attenuate the stormwater to meet the standards, we recommend that an additional traditional aboveground detention or retention basin be installed in line after the proposed systems as a fail-safe to afford long-term protection as underground systems are virtually guaranteed to degrade and fail over time.

- The proponent should include a safety factor in its stormwater calculations on the order of 30% to account for the reduced efficacy of the BMPs over time.

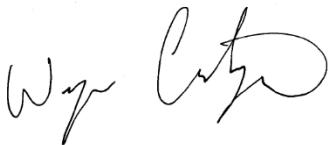
We are also aware that artificial turf carpet and infill may contain chemicals, including perfluoroalkyl and polyfluoroalkyl substances (PFAS), and other materials that can be released and contaminate the stormwater runoff. PFAS contamination is a known issue in the Town of Hamilton's water supply, and there are concerns that this project could exacerbate the situation and further cause potential downstream impacts, specifically but not limited to the Town of Ipswich's public water supply wells, which are located downstream in the Miles River watershed. No level of PFAS has been proven safe, and therefore it is our position that all materials should be PFAS free.

We also strongly recommend the following conditions for the proposed project:

- The General Contractor/Turf Supplier will conduct 3<sup>rd</sup> party testing for the currently regulated perfluoroalkyl and polyfluoroalkyl substances (PFAS) for the turf and infill to be installed, and provide written certification that the products are PFAS free.
- A third party, other than the property owners, should be contracted with to maintain the stormwater systems in perpetuity, including implementation and compliance with the Long Term Pollution Prevention Plan.
- As a part of the Long Term Pollution Prevention Plan, routine water quality testing on the project site should be conducted at regular intervals, annually at a minimum, throughout the lifetime of the project and results reported to the Town. Monitoring data will provide the Town with long term information on the effects of the projects on water quality and provide a basis for the Town to take corrective action as necessary.

If you have any questions, feel free to contact me. Thank you for considering these comments.

Sincerely,



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