



CITY OF SALEM CONSERVATION COMMISSION

NOTICE OF MEETING

*The Salem Conservation Commission held its regularly scheduled meeting on **Tuesday, July 20, 2021 at 6:30 PM** at the **City Hall Annex, 1st floor public hearing room, 98 Washington Street, Salem, MA.***

MEETING MINUTES

I. ROLL CALL

St louis
Hoskins
Cambpell
Ricciarelli
Sheehan
Vieira

Glode NOT present

REGULAR AGENDA

A. 16, 18, 20 Franklin Street – Public Hearing – Notice of Intent – DEP #64 -724, for Mike Paige, of Griffin Engineering. The purpose of the hearing is to discuss the redevelopment of the junkyard site located along the North River into a 37-unit residential condominium complex. Work includes construction of 1 townhouse and 3 garden style buildings with associated parking, landscaping, utilities, stormwater management system; site remediation, shoreline clean up, enhancement, and stabilization, removal of junkyard facilities, and construction of a public access walkway and landscaping along the North River shoreline. The project proposal is within an area subject to the Wetlands Protection Act MGL c131§40 and Salem’s Wetlands Protection & Conservation Ordinance.

Attorney Joseph Correnti, 63 Federal St., presents for the Applicant

This is a new Notice of Intent being filed for the Ferris Junkyard. The project was issued an Order of Conditions for the project; at the time it was 5 buildings and 42 units. The Planning Board process went forward and there were neighborhood meetings. The “Land in dispute” has been settled. The project will now be four buildings and 37 units. Changes to the site layout lead to the need for a new NOI. The first Order of Conditions was appealed by a citizen group, to DEP and the appeal procedure was paused due to revision in the Plans.

Now that there is a definitive Plan with the City, which has the support of many of the neighbors who were not previously in support. Bob Griffin of Griffin Engineering has prepared and filed this new Plan.

Chair St. Louis asks about interim work done to stabilize a pile of topsoil onsite pending remediation.

The pile has been removed. Once the Order is resolved, this should be noted. The 2018-2019 state Order has been resolved and this is a new filing.

Bob Griffin of Griffin Engineering presents.

- Site views and overviews, mostly flat at elevation 7
- Drains toward middle, all filled land, including Furlong Park
- Flood map: In AE flood zone elevation 10, coastal flood area, North River
- Resource Areas: LSCSF, Coastal Bank, Buffer Zone, small bit of Coastal Beach
 - Filled tidelands throughout site; anything within 200' of mean high water is mean high water, which means exempt from Riverfront requirements
 - Junkyard shoreline at Furlong Park – mostly made up of debris
- Approved Conservation Commission Plan from 2019
- Site Layout Comparisons, 2019 & 2021. Current property lines are reviewed; Project Site is shown
 - Proposed Layout: Plan has been approved by the Planning Board. Building locations are similar but town house building on Parcel A has been eliminated as that is now City land
 - 10,500 square feet of impervious surfaces have been eliminated, compared to 2019 Plan
 - Site must be raised so habitable areas are all above elevation 10. Elevations are described. Portion of site above flood water is shown on 2021 Plan.
 - Utilities will remain as before, coming in off Franklin St.
- MEPA process allowed DEP and CZM to provide comments to MEPA on the project incl. Energy efficiency, traffic, etc. Started ENF in 2019 and MEPA process re-started after ownership issue resolved. MEPA has sent add'l comments that will affect the Project.
- 2019: two discharge points, similar in 2021 but only one discharge point collecting drainage from paved and most roof surfaces
- Stormwater Management
 - Meets DEP standards for redevelopment
 - No recharge due to landfill/junkyard
 - "De minimus" area at Franklin St. Will not be treated
 - Water quality treatment device on site
 - Most roof runoff handled separately
 - Peer review completed during Planning Board process
- Junkyard remediation: plan was to remove contaminated soil in Areas A and B, AUL on site. New LSP did new add'l testing, now in DEP cleanup process; former owner was not. Tier 2 Site. GeoInsight LSP. Will separate recreational and habitable areas w/18" in recreational areas and 36" of fill in habitable areas. "Hot spots" would be removed from site. Will be a barrier layer and slab under garage to extract vapor so it does not enter habitable areas. Trenches around utilities will be surrounded by clean materials. Will still be an AUL on entire property
- Geotechnical testing: buildings will be supported on piers after preloading of site
- 2019 Coastal Bank stabilization: Riprap was to go up slope of area exposed to mean high water; landfill material will be protected by bank stabilization. DEP/CZM wanted a more natural means of stabilizing shoreline, now (2021) it is riprap only at the lower part, with

plantings on the rest of the slope. Comments today from MEPA tool exception from this approach; now DEP and CZM want to go back to riprap. Drawings provided are consistent w/planted bank but will need to be modified again due to comments

- Landscape Plan 2018 vs. 2021: ¼ acre added to open space in area B, pathway is more elevated due to LSP 18" separation requirement for recreational areas
 - Example of stabilized stone dust pathway is shown
 - Landscape example is shown' planting table is included and shown

Dan Ricciarelli: Overburdening of site, how long will it go on, how are floodwaters being mitigated?

- Area to be preloaded under the buildings, will take 3-4 months then moved to outfield, bring it back into site to raise parking areas to elevation 11. Then will take most of the year
- Slope stabilization approved in 2019 by DEP? Comments during neighbor's appeal, DEP did not act on appeal due to MEPA process, now complete, but DEP commented to day along w/CZM suggesting that natural shoreline is not what they want to see, b/c there is a lot of landfill material at this site

Chair St. Louis: Part of rear walkway connected to public right of way; still included?

- Public access is part of Application but corridor off to side has been eliminated. Will be through Furlong Park and middle walkway now. DEP is satisfied as far as Chapter 91 issues
- St. Louis asks about existing drain line, contained within own easement? Now that land is owned by City of Salem there is no need there, but can provide one on Parcel B
- Garage floor drains are out of flood plain, but St. Louis wants them to have the ability to be valved off so flood water does not enter sewer system
- Has Engineering Dept talked about total phosphorous in stormwater calcs? No, but this is a requirement of MS4 this year. Unit proposed does not do phosphorous removal, but compared to junkyard use this will have a positive impact on stormwater quality. They are not infiltrating b/c it has a landfill and junkyard history. It is a 21E site
- Chair asks about other special conditions to review from the first Application? None were of concern but can be reviewed

Bob Griffin suggests putting off voting until a future meeting, so DEP/CZM can follow up on comments, and Commissioners can do a site walk.

Tom Campbell: what sort of AUL restrictions will be onsite? Will there be ongoing groundwater monitoring?

- Will be limitations on accessing the ground; would have to be a safety Plan or under direction of LSP. Applicant will get more information
- Groundwater monitoring: LSP does not think there is a need for groundwater remediation, but may do some monitoring

Chair St. Louis: City granted downstream or other status re previous testing? Mr. Griffin is not aware of any. Both parties, former owners, claimed this land, resolution was a splitting of the land into Parcels A and B, City Council voted the deeding out and receipt of land, deeds were reviewed and approved for current owner relinquishing claim to Parcel A, was reciprocal for Parcel B, with Salem relinquishing claim to Parcel B, recorded at Essex Registry of Deeds.

Bart Hoskins: Parking on first floor, what happens if there is an extreme flood such as the one two years ago that would reach the level of garage drains?

- Garage floors are higher than in previous plan, but will add a valve as St. Louis mentioned above. Valve will be manually operated
- Riprap vs. Vegetation for stabilization – Park next door has sinkhole and erosion problems w/stone barrier; is there a hybrid approach? Plant aggressively at top w/rocks at bottom?
 - Mr. Griffin compares to Furlong Park, 2 rows of rocks w/vegetation in between, did not work. They are discussing plants above riprap, which will go up to elevation 8 or 9, then vegetated strip between rocks and walkway. Where to stop riprap will be discussed

Chair St. Louis discusses two relevant conditions on the original Order.

There are no comments from the public. The Commissioners schedule a site visit for Tuesday, August 4, 2021 at 5:30PM.

A motion to schedule the site visit as above, and to continue to the Aug. 17, 2021 meeting, is made by Bart Hoskins, seconded by Dan Ricciarelli, and passes 5-0.

Gregory St. Louis	Yes
Bart Hoskins	Yes
Tom Campbell	Yes
Dan Ricciarelli	Yes
Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

B. 342 Highland Ave – Public Hearing - Notice of Intent – DEP #64- 725, for Anthony Guba of A.L. Prime Energy. The purpose of the hearing is to discuss the project proposal to raze any remaining improvements and pavement on vacant lot and construct a new gas station and convenience store; work includes fueling islands, underground tanks, utilities, pavement and landscaping. The project proposal is within an area subject to protection under the Wetlands Protection Act MGL c131§40 and Salem Wetlands Protection & Conservation Ordinance.

DEP File # 64-785 has been received. Anthony Guba represents the project. He is a PE, LEED Certified Engineer.

Also present

Bill Manuel, Wetlands Scientist, Wetlands and Land Management

Anthony Guba Presents:

- Site location/vicinity map and isometric sketch, riverfront area. There will be no impervious footprint inside the riverfront
- Photo of current site conditions, on street and aerial views

- Existing conditions; 13' right of way provides access to #11R; Forest River is shown, culverted. 100' buffer is in abutter's property but 200' riverfront area does not follow river, runs along as shown on part of property. There are no other buffer or resource areas on the property
- Layout of proposed site improvements; wanted pavement around building and fueling area but test pits and delineation confirming ledge, groundwater and LSP assessment, yielded a different Plan than the one Commissioners have after Planning Board review
 - Several parking spaces have been removed and impervious areas reduced; changes are shown
- Proposed Plan overlay – aerial view. Will grade, restore, and enhance disturbed riverfront area instead of building a retaining wall. One other area will be disturbed to remove pavement, then will be re-vegetated
- Topography/grading plan is shown
- Landscape Plan is also slightly different from what is in package; 12 add'l shade trees are proposed and there is more diversity. Most plantings are not in the riverfront area. Will enhance what is there with vegetation that is friendly to wildlife. One area of mature canopy will be maintained
- Stormwater layout is reviewed. No connection to municipal or state drainage system. Grading has changed where the retaining wall was to be. Erosion control Plan is typical of a 1 acre site; Plan is described. Entire site will be curbed to control stormwater.
 - All concrete paving will include petroleum-impervious sealants so drips will not seep through
 - Erosion control features are shown
 - Tank and piping details shown to reassure Commissioners about protections
 - Emergency Response Plan is included
- Additional permitting required is described
- Can do project while minimizing riverfront area, will actually improve it by grading/plantings rather than wall. Area will not be maintained, will be "natural"

Dan Ricciarelli: Fill 5' at highest point; will this increase runoff on to neighbor's property? Wonders if retaining wall would provide better containment.

- None of site that is elevated will run off that way. Flow will be reduced by 60-70%
- Top of retaining wall; it would work in reverse b/c they would be at the top and things would go over it; would have to build it higher
- Roof and canopy drainage is outlined

Tom Campbell asks about the historical use of the property; there were two residences, but it is zoned B2 (business). An LSP was retained for due diligence, as it was characterized as urban fill, but also they were concerned about ledge. There had been a release onsite, but the file has been closed. Test pits were dug also to measure groundwater. Brian Moore, LSP at Carriage House Consulting, provided the analysis of no existing conditions of concern for this use.

Chair St. Louis:

- Driveway easement to rear lot – They are looking to purchase the property but there is a 13' right of way to rear site, which has no frontage. This would be in the deed once property is

- required. Needs to remain open for potential use of property in rear
- Abutter's driveway: Their attorney's title search indicates encroachment, but they will allow neighbor to leave driveway where it is
 - Chair notes overhead power from utility pole appears to be on neighbor's private property so Applicant will require an easement to connect. This is in concept, also could run from utility pole on Barcelona Ave.
 - Chair wonders if drainage calculations have been conducted; yes, stormwater report is done and may have gone out for peer review. Chair St. Louis defers to PB peer reviewer, but as it is a land use w/higher potential pollutant loads, proprietary structures are supposed to be a pretreatment, he does not see 44% prior to infiltration. This is discussed; by the end it will be over 85%
 - Infiltration units are described as an HDPE product and are further discussed; may react w/VOC's and hydrocarbons. This was explored and will not be an issue. Applicant can investigate again
 - Infiltration of 100 year storm, no breakout in side slope
 - Diesel island, concrete containment pad, others are outside 6.3 setback but diesel is into setback? Setback relates to structures, not pavement, canopy is on the line but pavement goes into that area

Public Comment:

Anthony Jermyn, 50 Ravenna Ave.

- Owns 11R Barcelon Ave. With the easement
- Mr. Guba does not have a P&S but the property to be developed does NOT include 11R
- Opposed to Plan, right of way will not work with elevations
- Proposes a condition that all utilities be brought to his property line, so land does not need to be opened aging
- Chair Louis notes it is not jurisdictional to ConCom, but Mr. Jermyn disagrees
- Can Mr. Jermyn blast so close to a gas station?
- Mr. Guba will send Mr. Jermyn his contact information to review these issues. Not proposing to disturb anything along the right of way and will not be changing topography or runoff along 11R in any way. Current access will not change, because riverfront area will not change at all. Mr. Jermyn insists this will make it difficult for him to bring in utilities

Richard LaChapelle, Highland Ave.

- Recalls two houses on lot, reviews history of previous owners
- Driveway: Old cement property marker at top of driveway indicates that driveway is on right of way that has existed for many years, halfway between driveways
- Dan Ricciarelli comments that this is outside of the Conservation Commission's Purview, possibly under Planning Board. This came up there too, but he has not seen Plans
- Chair St. Louis notes conversations like these should occur offline. Further peer review will be done

Paul LaChapelle, Rochester, NY, brother of Richard LaChapelle

- Parents gave Forest River to the City, subdivision Plan shows right of way up to Highland Ave.
- Vegetative cover proposed: existing is scrub brush

- Ground water: there used to be a pond/aquifer there. Ledge is an issue
- Richard LaChappelle cannot move driveway b/c of ledge, utility pole cannot be moved
- Concerned about wetland, proposed retention onsite will not be able to handle rain
- Calculations should be shown
- Chair notes these items will be included in the Planning Board's peer review
- 100-year flood refers to a storm event, which will also be included
- Not opposed to project, but it will remove open space

One comment was submitted just prior to the meeting, Mary Whitney, 385 Essex St

- If Agenda, is within Purview, ConCom order Continuance on all until current updates to floodplains and wetlands are updated
- Chair: we are guided by WPA, we are obligated to maintain thresholds, he is not in favor of commenting on that topic tonight

Applicant notes they must go back to PB Sept. They will ask what ConCom said, but ConCom has no other issues? They said they would wait for PB Peer review. Chair has no other comments. Concerns based on geotechnical review of soil logs, presence of former foundations, infiltration rate assumptions class B instead of class D. Not necessarily mischaracterization b/c system is larger than required, but he wants PB peer reviewer to comment b/c assumptions may be of benefit or detriment.

A motion to continue to the Aug. 17, 2021 meeting, following feedback from the Planning Board Peer Review, Dan Ricciarelli, Tom Campbell

Gregory St. Louis	Yes
Bart Hoskins	Yes
Tom Campbell	Yes
Dan Ricciarelli	Yes
Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

C. 289 Derby Street (Map 34, Parcel 441) – Public Hearing – Notice of Intent - DEP #64- 726 Representative for South Harbor Holdings, LLC. to construct a 20 foot wide by 195 foot long concrete walkway and a sewer line within an easement granted in 2019 to South Harbor Holdings, LLC at 289 Derby Street. The project proposal is within an area subject to the Wetlands Protection Act MGL c131§40 and Salem's Wetlands Protection & Conservation Ordinance.

Attorney Scott Grover represents the Applicant.

Tim Clark, Russ Tranzer reps

Steve Livermore Architect

Bill Ross NECE

Attorney Grover outlines the project:

- Charlotte Forten City Park; second property is related, abuts the park at 285 Derby St.

Owned by the Applicant

- How project fits into the larger vision of the Park:
 - When Park was developed by SRA, City recognized building at 285 was critical to activating the Park; SRA granted the owner of 285 a 20' easement for full length of Park to construct a public walkway to allow access from Park to Building
 - Hope was that opening solid brick façade would attract new businesses/encourage public use such as at Lappin Park (Flying Saucer, Gulu Gulu)
 - Aerial views are shown, easement is shown
 - South River Holdings has leased front part to Bakery/Chocolate co. Featuring an outdoor café, rear part leased to museum-quality exhibition on the Merchant Ship the Whitta, captured by pirates/wrecked on cape cod/discovered by treasure seekers
 - Hoping active buildings will activate underutilized City Park
 - SRA approved exterior changes to building and design of walkway; Bakery and Museum are fast tracked to open ASAP

Steve Livermore, Architect for bakery and museum re Walkway Design

- Elevation of building is shown with bakery and museum entrances
- Site Plan is shown for right of way; walkway will be concrete, similar to public piece next to South River.
- Still in PB discussion but planning an inclined walkway to allow people on river end to connect to public walkway

Bill Ross, Civil Engineer, New England Civil Engineering

- Site previously developed for park, grading along building already established
- Trees exist
- Lawn surrounded by granite sitting wall
- Peak roof discharges onto lawn, infiltration soaks in; proposed is 3900 sf sidewalk along building, sloped at 1% to discharge into lawn
- Increased impervious area – gutters discharging directly to river to address this, will send roof runoff to river directly, sidewalk to lawn
- Sewer service runs halfway down building, existing person hole serves entire building, will be brought into building through floor to easement, cleanout at back of building
- Don't want to disturb existing tenant, SATV, but must allow for cleanouts
- Sewer will connect inside to bakery, SATV, existing will be capped in manhole
- Manhole in street is private, owned and maintained by building owner, City OK with this as long as plugged/capped

Chair St. Louis

Calling it a walkway, but no stairs across wall to streetscape. Stairs are flush w/sidewalk, no step.

- Phosphorus Ordinance revised MS4 regulations? No treatment provided over what is currently there; goes to proprietary s

A motion to close the public hearing is made by, Dan Ricciarelli, seconded by Tom Campbell, and passes 4-0.

Gregory St. Louis	Yes
Bart Hoskins	Absent
Tom Campbell	Yes
Dan Ricciarelli	Yes
Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

A motion to issue an Order of Conditions with standard conditions is made by, Dan Ricciarelli, seconded by Tom Campbell, and passes 4-0.

Gregory St. Louis	Yes
Bart Hoskins	Absent
Tom Campbell	Yes
Dan Ricciarelli	Yes
Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

D. 0 Story Street, Lot A– Public Hearing – Notice of Intent DEP #64 - _____, Map 23 Parcel 2 for Stephen Lovely, for the Construction of a 30x60 Barn, utilities and access within an area subject to the Wetlands Protection Act MGL c131§40 and Salem’s Wetlands Protection & Conservation Ordinance.

Mr. Steven Lovely , 14 Story St. Manager, Castle Hill LLC, presents his project.

- Amenable to a site visit
- Site Plan; entire area is currently paved; area leading to barn will be gravel/crushed stone, not paved as shown on Plan
- Chris Mello Eastern Land Survey is not available but will be at site visit
- Dan Ricciarelli asks about the three houses originally applied for; in process of revising the Plan for proposed dwelling, which will be further from delineated wetland due to ledge. Lot C has an Order of Conditions; this is a new Application
- Proposed barn for agricultural applications; microgreens and small farm for family
- Proposed for this location b/c must be 100’ from property line
- Chair notes that utilities are mis-connected at street; don’t run water main into sewer main. ENG will correct this.
- Lots of trash has been removed from wetlands
- Going to leave pavement at rear for potential development there or on other side, other than driveway, all other pavement will be gone, will eliminate pavement going down Cleveland St. if possible

Ricciarelli: retaining wall in back for 7’ change? Not proposed, but can be added.

St. Louis: Concom not a fan of stone/removables along resource areas b/c it moves during plowing/no curbing/no control over where it goes. Ricciarelli thinks a retaining wall would help maintain crushed stone in place.

A berm behind the berm could be created to avoid migration. Barn logistics/slope are further discussed. A site visit is desired. Barn would be used for plantings and raised beds for vegetables in front. Daughter and son in law will be building the house, want to be self-sustaining and eat better. (Connect him w/Andy Varela, others running Mack Park).

Mr. Lovely has a building permit pending survey/resetting of proposed dwelling on lot A. ZBA tomorrow for Lot C setbacks/lot coverage but already have O of C for Lots A and C, now seeking one for barn.

Animals in barn? Yes. Already have ducks and chickens. Chair notes we do have fertilizer regulations, we don't want bacteria or nitrate loading of adjacent resources. Will be organic, Joan has background in Agriculture.

Letter was submitted to Commisison, it is included in meeting materials. Ms. Kennedy summarizes, then the letter is put on file:

Ms. Tardiff Ms. Bradbury, abutters, as submitted to ZBA:

- Variances
- 7-8' grade drop along edge of property. Lot C where previous development created slope onto their property; City ENG is in communication and project meets their criteria
- Request for ConCom ENG Building Inspector to do a site visit. Inspector, Salem Police have been down several times. If Commissioners want to do a site visit, large amounts of bituminous buried in Lot C, Lot A is virgin. Pavement to be removed is outlined.
- Kate Kennedy will send Mr. Lovely a copy of the letter
- Chair; comment re St. Anne Lane: lot lines vary from where this is shown in the letter. Applicant not sure what refers to; subdivision 1950 through St. Anne's park, now City has determined that those lots have merged but right in St. Anne's Way remain, only one abutter they are aware of has rights to get to cleveland St. Beyond St. Anne's park no rights remain south

A site visit is discussed and scheduled for Wed. Aug. 28th 6PM.

There is no file number yet thus no comments from the DEP

A motion to schedule the site visit as above, and to continue to the Aug. 17, 2021 meeting, is made by Tom Campbell, seconded by Malissa Vieira, and passes 5-0.

Gregory St. Louis	Yes
Bart Hoskins	Absent
Tom Campbell	Yes
Dan Ricciarelli	Yes

Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

III. OLD/NEW BUSINESS

A. FlyOver Switch, Waite Street - DEP #64-701 - Request for Certificate of Compliance

Sarah Barnum, BSC Group, requests the Certificate. The project is described and all work is in accordance with the Order of Conditions issued; site conditions were reviewed by the Agent.

A motion to issue the Certificate of Compliance is made by Dan Ricciarelli, seconded by Scott Sheehan, and passes 5-0.

Gregory St. Louis	Yes
Bart Hoskins	Absent
Tom Campbell	Yes
Dan Ricciarelli	Yes
Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

B. Wetlands Protection Update

Kate Kennedy provides an update. A Public Forum was held on July 13 with 70 participants. A survey is active online along with an interactive GIS map for people to peg locations of interest within ConCom jurisdiction. The next Forum is Aug. 19th. Survey results (survey closes Aug. 1) will be presented, along with draft policy. The 3rd public forum will be SEpt. 7th. All Commission members are encouraged to share the survey link and wetlands protection update site:

C. Commission Member Site Visits

Discussed as above. Invitations and locations will be shared in the future. Kate Kennedy notes another locaton around Wyman Place with Conservation Commission land nearby, please join her on a site visit to this problem area. 435 Life Storage active project on Highland Ave. Not site specific but some concerns. Dan Ricciarelli will accompany the Agent.

IV. APPROVAL of MINUTES

A. June, 2021 Minutes

Dan Ricciarelli is surprised that SiFi has not yet come back ,. Been in discussion, will seek outside opinion on a number of things, communication w/Linda indicated they know to be inf ront of concom again.

p. 6 of 10 livski Mark correction of name

A motion to approve the minutes is made by Dan Ricciarelli, seconded by Tom Campbell, and passes 5-0.

Gregory St. Louis	Yes
Bart Hoskins	Absent

Tom Campbell	Yes
Dan Ricciarelli	Yes
Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

V. ADJOURNMENT

A motion to adjourn is made by Sheehan, seconded by Ricciarelli, and passes 6-0.

Gregory St. Louis	Yes
Bart Hoskins	Absent
Tom Campbell	Yes
Dan Ricciarelli	Yes
Scott Sheehan	Yes
Malissa Vieira	Yes
Tyler Glode	Absent

The meeting ends at 9:20PM.

Persons requiring auxiliary aids and services for effective communication such as sign language interpreter, an assistive listening device, or print material in digital format or a reasonable modification in programs, services, policies, or activities, may contact the City of Salem ADA Coordinator as soon as possible and no less than 2 business days before the meeting, program, or event.