

Select Board members regarding  
Sewataro Dec 2021

Below are questions **from Select Board members** regarding Sewataro

This document is an assembly of inputs that can be addressed by multiple parties. I appreciate you using track changes or clearly indicating your inputs so I can update the primary file and know who submitted what data. **(hit EDIT, then REVIEWING when making changes – this enables tracked changes)**

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**Submitted by Janie Dretler:**

This first section may apply to multiple areas of responsibility. Please review for applicability to your expertise.

As a follow up to our meeting last night, I would appreciate a response to the following questions. I've copied Dennis and Jonathan as well as the Chair. Question 2 may require a legal opinion.

- 1) Will the Town perform its own independent review of the 2021 financials? Similar to last year, will Joseph Mercurio MST, CPA (GEORGE KAPLAN, PC) review the financials for the Town? If so, when do you expect that we will receive that information? It was noted last year that the Camp used a depreciation method that was different than what is required by AICPA. The Town's independent review can confirm that this did not occur again this year. I do not know if a full audit needs to be performed per the contract, but at a minimum, I believe the Town should repeat what it did for the 2020 financials.

**Sewataro Management contract – p. 6.**

- o **Recordkeeping.** Proper books and records of all revenues and expenses of the Manager shall at all times be kept by the Manager and subject to inspection and audit by the Town as hereinafter described. The Manager shall at all times keep and maintain complete and accurate records of all camper tuitions and other charges, usage or rental agreements, income, costs, and expenses in any way related to the Property. The Manager shall provide the Town with a financial statement and/or profit and loss statement audited by a certified public accountant (the "Manager's Financial Statement") reflecting all such information and such other information as the Town may reasonably request. Such statements shall be provided to the Town on or before November 15 of each year during the Term. Within thirty (30) days following its receipt of the Manager's Financial Statement, the Town, upon written notice to the Manager, may elect to audit the books and records of the Manager to determine the accuracy of the Revenue Share Payment. Such audit shall be conducted by a certified public accountant with at least ten (10) years' experience in the auditing of books and records who is not compensated on

Select Board members regarding  
Sewataro Dec 2021

a contingent fee basis. The Manager may elect to provide electronic records to the Town and its auditor. The Manager agrees to meet from time to time with the Town for purposes of reviewing such records and discussing the management of the Property.

**The Town is not anticipating the task of performing an audit of the financial statements provided. The Manager submitted the report from a CPA. Finance Director/Keohane & Town Manager/Hayes**

2) Can you please confirm that the PPP loan is appropriate to include in the revenue share calculation to the Town? I believe this is a gain on debt (loan) forgiveness and not revenue or income. Is the inclusion of the PPP loan amount considered a gift if it is not revenue or receipts? Can the Town accept a gift of this type? If so, what is the method to accept it? Does the contract allow a gift as written?

**Sewataro Management contract – p. 5**

1. **Net Revenue.** Manager's "Net Revenue" shall be defined as any and all revenues and receipts of any kind the Manager received during its fiscal year minus reasonable usual and customary operating expenses associated with day camp operations, programmatic activities on the Property, or other events on the Property.

**Explanation provided by Scott Brody 11/3/21:**

*A: Under the terms of our Management Agreement, "Net Revenue" is defined as "any and all revenues and receipts of any kind the Manager received during the fiscal year". Our accountant believes that the forgiven PPP CARE's Act money is not technically "revenue" or "receipts". However, though it may not be strictly required, we have chosen to include it in the revenue share calculation as an addition to net income from operations for the calculation of the revenue share amount due to the Town of Sudbury. It is our intention to do this again next year, assuming the second PPP loan is forgiven.*

**From Lee Smith:**

**In our opinion, if the Property Manager includes PPP loan funds it received as revenue or receipts in calculating the amount due to the Town under the Contract, the Town may treat such funds as part of the total revenue derived from the Contract. The Town may seek the opinion of its financial advisors and/or auditors regarding whether the PPP funds should, in fact, be treated as a gift, and if such determination is made, the Select Board may choose to accept the amount of the gift in accordance with G.L. c. 44, s. 53A.**

- 3) Please confirm whether this prohibits the Town from charging fees directly to any entity other than the property manager? How does **Attorney Smith's opinion** fit in with this language.

**[Sewataro Management contract – p. 6](#) – Section 3.1.1 Net Revenue**

The Manager agrees that Camp Sewataro, LLC shall be the only entity to receive revenues and receipts and to pay expenses in any way related to the camp and the Property and that no individual, natural person or other legal entity shall be utilized to receive revenues or to pay expenses in any way related to the Property.

**From Lee Smith:**

**The limitation in the last paragraph of Section 3.1.1 of the Contract requiring that “Camp Sewataro, LLC shall be the only entity to receive revenues and receipts and to pay expenses in any way related to the camp and the Property and that no individual, natural person or other legal entity shall be utilized to receive revenues or to pay expenses in any way related to the Property” is intended to prevent the Property Manager from utilizing multiple legal entities to act in a way to frustrate the intent of the Contract with respect to the Management Fee as set forth in Article 3. In the event that a mutual agreement regarding programmatic events would result in a conflict with respect to this clause, such language could be modified as an amendment to the Contract.**

- 4) Regarding **Town Counsel opinion** dated September 10, 2021 about the loss of the benefit of the limitations on liability afforded by the **[Recreational Use Statute G.L. c. 21, § 17C](#)**. What is the impact financially and legally to the Town? Please provide further context and an example.

**From Lee Smith:**

**The financial impact to the Town of the loss of the benefit of the Recreational Use Statute could be realized in a number of ways. First, the Town may determine that it needs to obtain additional insurance coverage which would likely result in increased policy premiums. Second, depending on what additional coverage is obtained, the Town could**

**be subject to paying damages resulting from claims resulting from injury or death. An example is a swimmer suffers injury or death resulting from actions or inactions on the part of the Town that are not protected by a limitation from liability, such as the Massachusetts Torts Claims Act, resulting in the Town being determined to be responsible for the injury or death and the assessment of monetary damages against the Town or a settlement of damages outside of a court judgment that is not covered by an insurance policy.**

- 5) Can revenue and/or fees be applied directly to debt service to reduce the Sewataro debt obligation? If so, how would applying the \$120k annual rent payment impact the existing budget? Would removing it from the budget, have an impact on existing services? How so?

**Sewataro Management contract – p. 5 – Article 3 – Management Fee**

**3.1 Management Fee**

(A) The Annual Fee shall be One Hundred Twenty Thousand Dollars (\$120,000.00) per each year of the initial Term to be paid in equal installments of Sixty Thousand Dollars (\$60,000.00) each due and payable on or before May 1, 2020, December 1, 2020, May 1, 2021, December 1, 2021, May 1, 2022, and December 1, 2022;

**No. The debt cannot be paid off early. Town Manager/Hayes**

- 6) I would like to receive a written summary of the MA DEP and DPH meeting that was held on Thursday, November 4 with Town staff. I also request that the Board have a discussion with Town staff including the Conservation Coordinator and the Health Director.

**Sewataro discussion: Health and Conservation, Scott Brody & Emmy Niinimaki, Town Manager & Assistant Town Manager** (From an email sent from the Town Manager to the Select Board on 2021 Nov 9)

- Modified Pool vs bathing beach... **state does not call it a pool**, based on the water not being filtered or circulated, among the total definition.
  - **Registration required as a Public Bathing Beach**
    - Camp Operator will register the Bathing Beach
    - Small body of water: not the same size as a lake, better for maintenance and mitigation efforts
- Environmental:
  - **Need to know the pre-chlorine water quality**
    - Develop an Operations and Management Plan and water quality testing program for facility
  - **No further use of chlorine**
    - Historically, the amount used in the past was not measurable in previous testing
    - Primarily to maintain clarity down to 4 ft
    - Can the water be dechlorinated prior to going back into the water bodies or surrounding areas?
      - Carbonization use as an option, or other technology?

Select Board members regarding  
Sewataro Dec 2021

- Chlorine reduces with sunlight, a natural mitigation to test and confirm levels
- Remove water when draining pool instead of draining to water bodies?
  - Bathing beaches are not treated by chlorine in MA
- **Algaecide will need to be permitted in advance of use**, and only used to treat a bloom, not to prevent a bloom
  - **Notice of Intent (NOI) filing: Algaecide and changes to the spillway**
  - Primarily used to reduce slick surfaces
  - 8-10 week process
- **There is confidence that there is a way to satisfy the Department of Environmental Protection (DEP) and Department of Public Health (DPH) requirements**
  - The mitigation efforts are under consideration and have been anticipated by the Camp Operator and team
  - Can the upper pond be separated from the lower pond and be a stand-alone system, without feeding the lower pond and eco-system?
    - We anticipate that there is a healthy eco-system in place now, based on the wildlife not being adversely impacted to date.
  - Consider changes to the spillway routing in order to control the water that is utilized in that body of water
  - Water discharge distance, will measure to ensure the regulations are met
- Accountability is welcomed, in effort to be good stewards
  - Safe water for bathers, wildlife and authorities of concern
  - Scott Brody is the person that reached out to DPH and DEP, in effort to deepen the understanding and anticipated actions
  - Will explore other acceptable methods
  - Wetlands and Waterways team has not provided input to the Town yet

**Following are a few notes from Bill Murphy's meeting with Mike Beattie of DPH regarding Sewataro: added 2 Dec 2021**

- No State registration for swimming bathing beach required. All permitting through local health department;
- Town should develop weekly testing program with beach closure policies throughout operation. Recommended to begin testing lower pond to get some baseline information about bacteriological quality. Closure largely influenced by weather (rain), temperature, and bather loads. Board of Health (BoH) can appoint camp as agent to test but not recommended with heavy pressure to open if closure is necessary.
- Permanent signage needed with clear operational dates and disclosure that water is not tested out of season. Signage primary location to post closure if necessary
- Bacteria standards discussed. One sample vs. geometric mean sampling
- Increased correspondence with DPH throughout season regarding testing results.

7) How will the costs for each of the options presented by the Manager be paid for? Will they pay them directly or are they proposing to share the cost with the Town? If so, will the Town need to pay prevailing wage and bid out the projects?

Select Board members regarding  
Sewataro Dec 2021

**Access Enhancement Proposal:**

- Who will pay for these upgrades?
- Camp Sewataro will cover the costs, according to the process laid out in the contract as we have done with previous capital improvements.
- Extra Maintenance & Clean-up
- The Camp Operator will assume all responsibility for clean-up and rubbish removal at the conclusion of each swim session, by a designated member of the camp's Grounds Crew.

**Sewataro Team**

8) Regarding the pools, is the Manager proposing to allow adults in the training pools? If so, how deep is each pool? Would the capacity change if adults are allowed in the outside heated pools?

**- Can adults swim?**

- Yes, the proposal is for adults and children to swim in the pond or pools (Option 1.b "Pool Swimming" in the 2022 Resident Access Enhancement Alternatives document, submitted on October 29, 2021.
- The bather load in each pool is 53 people. We have proposed the number of swimmers (25 per pool, per swim session) based on safety and hiring lifeguards. This allows adults and children plenty of space to swim safely and comfortably. **Sewataro Team**

I will reserve additional questions about the water features at Sewataro regarding environmental, conservation and health related to the spring and Pantry Brook until we receive an update from the Town Manager about the MA DEP and DPH meeting that was held with Town staff on Thursday, November 4.

- Insurance: "In addition to statutory limitations on liability that may be available, the Town can seek to limit its exposure to financial liability for claims by obtaining sufficient insurance coverage for the use in question. I recommend consulting with the Town's insurance representatives on this topic to determine whether offering the use of the swimming areas for residents is insurable, what risks they determine need to be addressed and the types and costs of insurance coverage may be available." Brought up in Select Board meeting / 2021 Nov 30
  - **Right now we don't have coverage for public use. They would have to add that to liability exposure but would need to know if we were charging for the use and if we would be providing lifeguards. ATM/HR/Bilodeau**

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- KP Law Question brought up in Select Board meeting / 2021 Nov 30 regarding previous Opinion: And third, the fee must not be used to raise revenue, but instead is intended to offset the cost of governmental services.
  - How is this a cost of governmental services when the Camp Operator is performing the service? Is this legal for the fees to be charged?

**From Lee Smith:**

In our opinion, if the Property Manager makes the “waterfront” available to the public pursuant to an amendment to the Contract with the Town and charges users a fee to access the waterfront, while the Town is not directly providing “governmental services”, the Town has contracted to make the services (waterfront access) available to the public. The fees collected for the use are likely to be deemed “municipal fees” and therefore should be established in accordance with Emerson College v. City of Boston, 391 Mass. 415 (1984), particularly, the fee must not be used to raise revenue, and must instead be used to offset the cost of services provided- being providing access to the waterfront. The fees collected should be treated as revenue or receipts of the Property Manager in calculating the amount due to the Town under the Contract and the Town may treat such funds as part of the total revenue derived from the Contract.

**Submitted by Charlie Russo:**

**Town Counsel**

- What modifications are legal to institute in any renewal of the Camp Operator contract? Specifically:
  - Can the renewal be changed to a 1-year term?
  - Can the minimum annual payment of \$120,000 be changed?
  - Can the “Amendment” process that has been previously used play a role in the renewal process? If yes, how? If no, why not?
- Has Town Counsel reviewed the “semi-public beach” concept of the Access Enhancements (additional swimming) proposal? Does Town Counsel agree with this approach and its feasibility?
- Does Town Counsel have any advice, from a legal compliance standpoint, after reviewing the Access Enhancement Proposal regarding whether the additional Resident Swimming or Phase One ADA Compliance Upgrades is safer choice, in legal or liability terms?

**From Lee Smith:**

KP Law, P.C. has reviewed the 2022 Resident Access Enhancements Alternatives dated October 29, 2021, as submitted by Camp Sewataro, LLC. We agree that, as stated by the Property Manager, the proposals set forth therein are outside the scope of the current contract. However, such proposals could likely be addressed by a mutually agreeable amendment(s) to the contract. The proposal includes both programming elements as well as compliance elements with respect to Health Code Regulations and ADA compliance. In our view, the programming elements are policy decisions to be considered by the Select Board. As focus is narrowed and preferred proposals are further advanced, we recommend that additional analysis, including review of



**recommendations and opinions from third-party consultants, be conducted to complete a legal analysis as to potential ADA compliance matters, as well as compliance with applicable state health, safety and accessibility requirements, as such matters are highly fact specific given the scope of a particular proposal.**

- This has been brought up previously, but I'd like some clarification. Is there the opportunity to extend the current Sewataro contract by one year? Would that be an acceptable change within the current contract or would it require it to go out to bid again? I'm just wondering if it's an option at all.

**From Lee Smith:**

**In our opinion, the analysis as to whether modifications (amendments) to the current contract would require a new bid/RFP process will depend on the particular proposed modification and whether it is consistent with the Request for Proposals for Management of Camp Sewataro dated July 24, 2019 (the "RFP"). The guiding principle is whether the subject of the modification is within or outside of the "four corners" of the RFP and whether the modification would create a competitive disadvantage to a party responding to the RFP. For example, as was set forth in the RFP, the current contract term is for three years and the Town has the option at its sole discretion to extend the agreement for two additional five year terms. In our opinion, the Town could extend the current contract by one year rather than five, assuming the other party to the contract agrees to do so (i.e. by mutual agreement). However, if there is a subsequent extension, it is our opinion that the term could not be for more than 4 years so as to remain consistent with the five year extension term specified in the RFP. In contrast, if the Town sought to extend the contract term beyond the two additional five-year terms, a new request for proposals would be necessary.**

**In our opinion, depending on the facts of the proposed amendment to the "price" of the Property Manager's services, it could be the subject of a contract amendment because there were no parameters associated with the "price proposals" elements of the RFP and the RFP stated that "The Proposal offering to pay the highest payment may not necessarily be the most advantageous proposal when other qualifications and proposals merits are considered."**

### **Town Staff in General (Conservation & Public Health):**

- Is the fishing pond considered a wetland under Town Bylaw and/or state WPA?
  - **A pond is any open body of fresh water with a surface area observed or recorded within the last ten years of at least 10,000 square feet. Ponds may be either naturally occurring or human-made by impoundment, excavation, or otherwise. Ponds shall contain standing water except for periods of extended**



**drought. The following human-made bodies of open water shall not be considered ponds: basins or lagoons which are part of wastewater treatment plants; swimming pools or other impervious human-made basins; and individual gravel pits or quarries excavated from upland areas unless inactive for five or more consecutive years. The Bylaw reduces the size threshold of a pond from 10,000 to 5,000 s.f. and contains the same exceptions.**  
**Conservation/Capone**

- **The fishing pond is around 100,000 s.f. in size and does not possess an impervious basin, therefore the fishing pond is a wetland resource area under both the Wetlands Protection Bylaw and the Sudbury Wetlands Administration Bylaw. Conservation/Capone**
  
- **Is the swimming pond considered a wetland under Town Bylaw and/or state WPA?**
  - **The swimming pond is a human-made basin with an impervious barrier and would not qualify as a pond under the Wetlands Protection Act or the Sudbury Wetlands Administration Bylaw. However, the swimming pond is hydrologically connected to the fishing pond and Pantry Brook. Discharges from the swimming pool to regulated wetlands resource areas would be activities that require review and approval from the Conservation Commission under the Act and Bylaw. Conservation/Capone**
  
- **If yes for any wetlands, have these factors and potential required permits been considered as part of any updated swimming or renovation proposals? What ConCom permits might these enhancement proposals require?**
  - **The Commission reviewed the camp operations in 1988 when the property was being subdivided for housing. No permitting was required at that time for the camp operation. The proposed expanded use of the camp raised concerns that this expanded use would require increases in chemical treatment of the water. The introduction of chemicals into a wetland resource area does require review and approval from the Conservation Commission. A recent meeting between representatives of the Town, DEP and DPH resulted in a question as to whether the existing operation is permissible, given the chlorination component, and that a Notice of Intent would need to be submitted for the algaecide treatments and any structural modifications that may be needed within wetlands jurisdiction. This NOI application would be needed with or without the enhancement proposal and should include an Operation and Maintenance Plan for the ponds/pools and maintenance work within 100 feet of the**

**wetlands and should also include a Water Quality Monitoring Program for upgradient and downgradient wetlands resource areas and within the ponds/pool. DEP Wetlands and Waterways Program is yet to provide comment. Conservation/Capone**

- **In regards to the 2022 Resident Access Enhancement Alternatives, a Notice of Intent may be needed for some of the proposed improvements. If the proposed new parking area and walkway between the pool and pond are proposed within 100 feet of the fishing pond, they may require a Notice of Intent or Request for Determination of Applicability to be filed with the Commission, depending on the extent of work. If drainage from the parking area is proposed to discharge to the fishing pond, then this would require permitting with Conservation whether or not the parking facility is located within wetlands jurisdiction. Conservation/Capone**
  
- Has the health department weighed in on the Access Enhancements (additional swimming) proposal? If yes, please provide that information. **See above**
- Has the state DPH reviewed the Access Enhancements (additional swimming) proposal? What was their reaction? Please share what questions they had that were asked and answered. Does DPH have any unresolved questions? **See above**
- Does Town Staff foresee any additional Town staff resources/time/effort be required should either/or Access Enhancement option move forward? If yes, please provide that information.
  - **No additional conservation staff or resources would be needed. Conservation/Capone**

**Town Finance Director: there are different scenarios to examine in the totality of the things being put forth here...**

- Can you confirm the details and sequence of this line of thinking:
  - Before the Town's purchase, Camp Sewataro paid \$575,000 in "rent" per the Town Manager's 2019 Town Meeting presentation
  - Of the \$575,000, approximately \$200,000 was property taxes paid to the Town, which left a ~\$375,000 annual rent payment to the previous owner?
  - As a result of the purchase, the Town "loses" the ~\$200,000 in property tax revenue because it now owns the land?

Select Board members regarding  
Sewataro Dec 2021

- But the ~\$200,000 didn't get chopped off the budget; this amount gets redistributed among taxpayers, correct? This redistributed amount comes to approximately **\$27** per household, assuming the median home value of **\$682,450**
- The debt payments are currently **\$109 (FY22)** per household (decreasing over **19** years), assuming **the median** value of **\$682,450**
- So total to taxpayer, assuming the **median** home value of **\$682,450** is **\$27+\$109=\$136 Finance Director/Keohane**
- We pay 50% of utility costs? **The Town does not pay 50% of the utility costs for Camp Sewataro. Finance Director/Keohane**

## Camp Sewataro

- What are the forecasts for the amount of annual revenue share payment to the Town over the next five years assuming max camper capacity?  
**What is the predicted revenue share over the next 5 years?**
  - **Using 2021 expenses and revenue as a baseline for projections, rent and revenue share for 2022 is likely to be the same as 2021, including additional funds due to the anticipated forgiveness of the 2nd PPP loan. Going forward, if camper enrollment remains steady, and price increases offset increased expenses, we would anticipate annual revenue share plus rent would be approximately \$295,000. Of course, this does not include the 50 scholarship camper spots offered to Sudbury residents in need for each and every 2 week session, nor the other benefits enjoyed by Sudbury residents which are paid for by the operator. Sewataro Team**
- Please confirm that camper capacity was 100% for the 2021 season?
  - **Camp was open at 100% capacity. There are some enrollment nuances year to year that mean we don't always max out ever week. We also did not fill all scholarship spots despite ours and Bethany's best efforts. We are working with Bethany and the school system to find new scholarship campers for 2022. Sewataro Team**
- 200 campers from Sudbury is an oft-cited figure. What is the number of Sudbury families attending Camp Sewataro? Is it safe to assume most families have 2 kids attending, so assuming the 200 camper figure is accurate, is 100 the rough estimate of Sudbury families attending Camp Sewataro?

### Numbers of Campers 2021

- **230 Sudbury Families**
- **352 Sudbury Campers**
- **70 Sudbury Staff Members**
- **Average of 612 campers/session**
- **Average 1245 campers/summer (over the previous 5 summers, excluding 2020)**  
**Sewataro Team**
- What are the physical dimensions of the four pools?  
**What are the dimensions of the pools?**
  - **20'x40'**
  - **Depths: 2 ½ feet, 3 feet, 3 ½ feet, 4-5 feet Sewataro Team**
- Can you provide the current O&M plan for the pools and the swimming pond used in Camp operations?

Select Board members regarding  
Sewataro Dec 2021

**Capital projects/enhancements/maintenance items**  
**- Capital Projects/Expenses/Maintenance October 2019 - Present Sewataro Team**

	10/1/19 - 9/30/20	10/1/20-9/30/21	10/1/21-present	Totals
Adjustment of fence at back of property for new fence line (Andover Fence)		13,775.00		13,775.00
Public access fence & climbing wall fence (Reliable)		19,475.00	19,475.00	38,950.00
Prep for front gate - electric (Jack Nemesky)	2,301.56			2,301.56
Prep for front gate - excavation (Tony D'Amato)	1,850.00			1,850.00
Storm Damage Repairs (Arrow Fence)	1,392.44	454.50		1,846.94
Garage door for #2 (Diamond Overhead Door)	2,000.00			2,000.00
Tree Work (Rusty)	3,400.00	4,600.00		8,000.00
Signage (Signarama & Alpha Graphics)	2,546.38	3,745.88		6,292.26
Work on parking lots/paths (in house, materials from Kane Perkins)	660.00			660.00
Parking/Paths (Lombado Loam & Gravel)	6,672.50			6,672.50
Water pump repair Feb 2020 (Skillings & Sons)	512.32			512.32
Security cameras (Arlo)		165.60		165.60
Security cameras ( Best Buy)	424.99			424.99
Liberty Lodge strip/stain (Heritage Natural Finishes)		563.84		563.84
Heritage Heating & Solar Corp (Furnace Cleaning, new boiler)	1,734.00	8,257.00		9,991.00
Winter Pool Covers (Discounters Pool and Spa)	295.96			295.96
Pool 1&2 liner replacement & add 2nd main drains (Central Pools)		8,039.27	7,400.00	15,439.27
Pool 1&2 liner replacement & add 2nd main drains (Puraqua)		1,005.77		1,005.77
Pool/Pond Maintenance (Intheswim, Aquacide Co.)	6,268.66	8,530.36		14,799.02
Pond Stocking (Hickings Fish Farm Inc.)	1,910.00			1,910.00
Cleaning Services (Irma Torres)		650.00	11,600.00	12,250.00
Septic Maintenance (Wind River)	530.10	837.78	505.32	1,873.20
Septic Maintenance (CPP)		3,480.00	460.00	3,940.00
Irrigation Maintenance (SiteOne)	956.05	767.68		1,723.73
Landscaping Maintenance (PJL)	23,932.00	33,763.82	1,905.00	59,600.82
Landscaping Maintenance (Douglas)	22,307.19	76,148.13	16,832.00	115,287.32
Insect Control (Lawn Management Corporation)	6,228.20	6,775.20		13,003.40
<b>Total</b>	<b>85,922.35</b>	<b>191,034.83</b>	<b>58,177.32</b>	<b>335,134.50</b>

**Potential Future projects:** Our ability to make capital enhancements depends upon developing a shared understanding with the Town about priorities for non-camp and camp use. The greater certainty provided by a longer renewal period provides us with the ability to make larger investments in the site, as these need to be depreciated over time. With a term of sufficient length, it could be possible to add additional indoor sports and other facilities. All such projects will be undertaken with our accessibility goals in mind and after consultation with all appropriate stakeholders. - The operator has met or exceeded all of the management objectives embedded in the agreement with the town, including maintenance of the site and the successful operation through Covid. In a post-pandemic environment, we could devote even more of our attention and resources to successful management of this property and the programs that operate on it. Sewataro Team

Submitted by Dan Carty:

- Is Scott Brody and team willing to continue for another 5 years?

Submitted by Jen Roberts:

Select Board members regarding  
Sewataro Dec 2021

**Questions for Property Manager/Camp Operator**

- How many user groups have used the Sewataro in the past year?
  - What were their activities?
  - How many are repeat users?
  - Have they provided any feedback?

**Resident Programming/Reservations:**

**- User Groups 2021**

- 35 Groups
- All but 2 of those were repeat users
- Those 2 hosted recitals on property, and 1 has inquired about booking in the spring of 2022.
- Number of uses varies considerably. Some Scout Groups have met twice a month, year round since we opened access to residents.
- By the month:
  - January 2021: 6 groups, 20 hours
  - February 2021: 6 groups, 24 hours
  - March 2021: 9 groups, 44 hours
  - April 2021: 18 groups, 121 hours
  - May 2021: 19 groups, 194 hours
  - September 2021: 9 groups, 43 hours
  - October 2021: 13 groups, 98 hours
  - November 2021 (as of 11/13): 9 groups, 42 hours
- This is a tally of scheduled pavilion use only. We do not track the many groups and individuals that come to the property to use the tennis and basketball courts, fish, walk, bike, sled, snowshoe, etc.
- **Types of Events Scheduled include:** Book Clubs, Sudbury Villagers (seniors), Scouting groups, martial arts, dance and fitness classes, garden club, local music and theater schools.
- One question asked specifically about winter use. Our winter users are mostly Scout Groups, although a few fitness classes continue to take place in colder weather. We do not have information on the number of attendees for winter (or fall/spring) scheduled events.
- Many groups initially expressed that they chose to meet at Sewataro because they needed outdoor space due to COVID, but have continued to gather on the property because they enjoyed their experiences so much.
- 2 groups scheduled events and cancelled
- 1 due to weather conditions (moved indoors); 1 cancelled due to COVID
- 1 group inquired and chose not to schedule on the property because they wanted to serve alcohol at their event
- **Feedback from Users**
- We have received a great deal of positive feedback about our responsiveness, the ease of scheduling, and the facilities and grounds.
- Early on, groups requested access to parking on the back side of the property and we worked with the Town to open up the back gate and parking area.
- We also received feedback about bathrooms, and put portable toilets on both ends of the property to meet user needs.
- We also have a great deal of positive feedback from countless camp families regarding

Select Board members regarding  
Sewataro Dec 2021

their experiences at Sewataro, which we are not including here.

- Below, please find some of the notes we have received from individuals and user groups over the past year and a half: the following two colors are used (**Bold**, **Color**), however, the altering colors are from patrons of the Camp.

- ◆ **What a wonderful time we had! While I'm partial to the pond because I love fishing, that hidden field by the Treehouse was like a dream. We played freeze tag, danced, opens gifts, and ate pizza. It was a gathering before my pops had knee surgery and my sister and her family move to Maine. The ambiance was just perfect. What a special place to have less than a mile from our front door. We look forward to spending more and more time there. THANK you for your communication and support, Kristen. It really was one of the more dear family gatherings we've had.**
- ◆ **Great time at Sewataro today. Thanks for all your help, Kristen!**
- ◆ **Kristen, Thank you to all the staff and volunteers for last Thursday's event. It was so fun for the kids and the grown ups. A treat during these times! Thank you!!!**
- ◆ **I'm glad that ADA consideration are underway! Excellent. I'm hoping that post Covid my tendonitis issues will have been resolved, but it's already been almost a year. It makes me quite aware of the limitations that others have for the rest of their lives. It's too bad that the darn virus prohibits a meet-up; that would've been wonderful, but I would be more than happy to stay in touch with you if you think I could be of any help in brainstorming, etc. And I would love to be able to take my friend who's 89 up there for a drive someday. She'd love it. Thank you for your help and most importantly, your kind interest. Maybe we can continue our discussion someday!**
- ◆ **Kristen, WE loved your space. Can we have it again for our November 5th meeting??? All of your staff were so helpful. I didn't catch the name of the fellow who directed our cars to the parking space. He did a great job. And he quickly set up another table when he saw me bringing a portable one down the path. Amy (I think that is her name) couldn't have been more helpful. She continually checked in with me and others to see if she could do anything. And Nathan did an excellent job with his presentation and helping me with your mic system. Our members had lots of questions for him on Sewataro in general, and the Long House in particular. He pointed out the curtains that can be drawn across the "windows" to keep out the cold, rain, wind... I sent an article to the Town Crier, hoping they'll publish it next Thursday. I'm attaching it for your info. I'm also attaching the photos I sent that accompanies the article. I am serious...could we use that space 11/5? Thank you so much for all your help in making our gathering a success.**
- ◆ **Thank you very much. Cub scouts and parents had so much fun. Almost everyone caught and released either small bass or sunfish. Those who have never been to Sewataro were at awe how nice and large campgrounds are. There were questions about a possibility of using pond and swimming pools by Sudbury residents during summer. Unfortunately, I didn't have answers. Perhaps, it is something that town and camp management are looking into with proper regulations next summer.**
- ◆ **I just wanted to say thanks for letting us use the space at Sewataro for our meetings and having it ready with tables and chairs. It allowed us to meet on a regular basis while maintaining all the necessary covid safety precautions. We had some chilly days, but I am proud to say we only had to cancel 1 meeting and that was because it fell during a snowstorm!**
- ◆ **Hi Kristen. I just wanted to let you know that everything went well yesterday! Despite the rain and temperature of only 47 degrees, we had a great time! Only a few people opted not to come and some switched over to zoom attendance. I put all of the sandwich boards**



Select Board members regarding  
Sewataro Dec 2021

back at the garage. They were very helpful in guiding people to the lodge. Please let us know if there are any issues - I think we left everything as it was when we arrived. Thanks again!

- ◆ Select Board and Town Manager. I'm ----, President of The Sudbury Villagers, a social and civic organization comprised of senior ladies from Sudbury and surrounding communities. We've been in existence since 1972. Prior to Covid, we held our monthly general meetings and programs at the Goodnow Library. With that venue option being off the table for the duration, we were very excited to learn of the facilities at Camp Sewataro. In mid-September I started communicating with Kristen Drummey about their hosting our October meeting at what now is called their Liberty Lodge. Not knowing how many would be attending our meeting, Sewataro was able to round up 50 chairs. They also provided tables for our displays, and worked with our entertainers for their sound-system needs. Everything went extremely well. They also had staff members directing "traffic" through the back gate and to parking areas. We were so pleased with the venue and staff that we held our November General Meeting and Program at the Liberty Lodge as well. Going forward, I have reserved the Liberty Lodge for a Winter Gathering and May Luncheon. I am so pleased that Sewataro is open for our general use and enjoyment.
- ◆ Kristen, Thank you. Everything was there and perfect for our get together. We enjoyed our time at the camp and in the long house.
- ◆ It went very well! On behalf of Sudbury Girl Scouts, I want to thank you so much for the use of the lodge at Sewataro, and being so easy to work with. It was a great day - the sun even came out for us, right when the ice cream truck was there. :) (Thanks to the BOH's speedy work in turning around a permit too!). I think the girls all had a great time, and the parents too. It's been such a lovely experience getting to know the camp and grounds...looking forward to the next event!
- ◆ Kristen - I can't thank you enough for letting TPAC use Sewataro and for your endless patience as we navigated and took on way more than we thought would have ever come up! I couldn't have asked for a more flexible and supportive person to help us ensure the venue was just right! Thank you!
- ◆ Thank you for having Sudbury Girls Lacrosse on your fields! We're done for the Fall, but would love to return in the spring if that works for you.
- ◆ We had 225 student musicians perform. We had over 600 guests. Reasons to be Cheerful served 230 cups of ice cream (they had to have more ice cream brought over twice). Juliana's served 335 slices of pizza. I do not know how many drinks or chips they sold. We had 1 scraped knee, countless rounds of applause and an infinite number of smiles under face masks. We would love to make this an annual event and select a date for 2022 if permitted to do so.
- ◆ Dear Kristen, On behalf of the Sudbury Community Food Pantry, President Pat Mullen and the Board of Directors, JT and I want to thank you for all you did to make this year's school food drive program a success. I believe you initiated the idea of Sewataro being a possible site for providing accommodations for the food drives and Board Member Michelle Meal presented the possibility to the Board. From there we were off and running. You were great at taking us to the next level and readily being available through text/email to answer our questions and requests or to coordinate something with Ramon or Chuck for us. Your having been involved with the Haynes School food drives in the past was certainly helpful in determining which facilities at Sewataro you thought would best meet our needs. Your choices were perfect. The open air atmosphere of the huge garage was just



Select Board members regarding  
Sewataro Dec 2021

what we needed to make the school parent and pantry volunteers feel comfortable sorting together during the pandemic. The space provided fresh air and adequate space for social distancing. Also, being allowed to store the banana boxes there and to be able to leave the sorting boxes intact was extremely convenient and time saving. JT, Tom, Ron and I were always so impressed with your energy, your can do attitude, your problem solving skills and your willingness to get involved. You had tables, etc. set up for us, doors open before we got there, signs out to direct the school parent volunteers, and food donations from the bin onto the sorting table in the garage. We appreciated how you became directly involved in the sorting and giving helpful directions to the new volunteers trying to figure out which box to put what in. The food bin idea of yours was excellent. It certainly added to the total of our donations and gave an opportunity to non-school parents, who had contacted you, a convenient location to leave their donations. You were an essential factor in the success of the 2020-2021 school drives and we thank you very much. We wish you continued success in your role at Sewataro and as the Sewataro Liaison to the Town of Sudbury.

### Sewataro Team

- Do you know how much Sewataro is used by residents: **See above**
  - o during camp season? **See above**
  - o during non-camp season? **See above**
- How many campers attend the camp each year? **See above**
- How many campers are Sudbury residents?
  - o **352 Sudbury Campers/2021 Sewataro Team**
- How many Sudbury residents are employed by the camp?
  - o **70 Sudbury residents on staff Sewataro Team**
- Are there any additional ways to increase camp season resident access to Sewataro? (In addition to swimming access and enhanced ADA access proposals)
  - o For example, back tennis and basketball courts?
- What are the differences between a camp beach, semi-public beach, and public beach?
  - **What is a semi-public bathing beach?**
  - Per 105 CMR 445.00: MINIMUM STANDARDS FOR BATHING BEACHES (STATE SANITARY CODE, CHAPTER VII) Semi-public Bathing Beach means any bathing beach that has common access and/or common use by a group or organization, which includes:
    - 1. Any bathing beach used in connection with a hotel, motel, a manufactured home park, other similar establishment where the primary purpose of the establishment is not the operation of the bathing beach, and where admission to the use of the bathing beach is included in the fee or consideration paid or given for the primary use of the premises; or
    - 2. Any bathing beach used in connection with a neighborhood or residential association; or
    - 3. Any bathing beach operated solely for the use of members and guests of an organization that maintains such a bathing beach
  - Public Bathing Beach means any bathing beach open to the general public, whether or not any entry fee is charged, that permits access to bathing waters.
- There is not a specific 'camp beach' designation. Our swim pond is very unique (man-made, gunite-lined) and has historically been considered somewhere between a pool and semi-public beach. **Sewataro Team**
- What are the dimensions and capacity of the current pools?

Select Board members regarding  
Sewataro Dec 2021

**What are the dimensions of the pools?**

- 20'x40'

- Depths: 2 ½ feet, 3 feet, 3 ½ feet, 4-5 feet **Sewataro Team**

- Would increasing resident swimming access have any impact on water quality?
    - o Can this be mitigated? How?
  - **How would resident swimming impact the pond/pools?**
    - Although possible, it is not anticipated that resident swimming in the swimming pond would have a significant impact on water quality, provided that current water quality measures are allowed to continue.
    - We do anticipate that increased bather load in the pools would affect water quality, which is the reason that chlorine automation is included in the pool only swimming option for the Town. **Sewataro Team**
  - Do you have other recommendations for improvements at the Sewataro property for residents and campers:
    - o access enhancements?
    - o capital enhancements?
- Access Enhancement Proposal:*
- **Who will pay for these upgrades?**
    - Camp Sewataro will cover the costs, according to the process laid out in the contract as we have done with previous capital improvements.
  - **Extra Maintenance & Clean-up**
    - The Camp Operator will assume all responsibility for clean-up and rubbish removal at the conclusion of each swim session, by a designated member of the camp's Grounds Crew.
- Sewataro Team**
- Are there any issues/challenges in managing the Sewataro property that the Town should be aware of? Please describe.

**Financials**

- What impact has the Covid pandemic had on the camp financials?
- Do you believe this past year is a typical camp financial results year? Why or why not?
- Do you believe this past year is a typical Town revenue share year? Why or why not?
- How has the PPP loan:
  - o affected fiscal management of the camp?
  - o affected Town revenue share?
- What are the capital projects/enhancements/significant maintenance items you have addressed at the property?
  - o How much have they cost? **SEE ABOVE CHART AND RESPONSE**
- If you continue to manage the property, what future capital projects would you like to address?
  - o How much do you think they would cost?

*Financials:*

Select Board members regarding  
Sewataro Dec 2021

**- Is the audited financial information accurate?**

- The Camp Sewataro Financial Reports were sent to the town dated 9/30/2021 (sent on 10/28/2021 of the 9/30/2021 statements). Certified Public Accounting Firm Korbey Lague was contracted to do the independent review. This is a separate firm from Camp Sewataro LLC's accounting firm Joseph Mercurior MST, CPA (George Kaplan, PC).

- As noted in the notes within the Financial Report, the accelerated depreciation method was used.

- This was all carried out in accordance with the Sewataro Management Contract (p. 6): "Such statements shall be provided to the Town on or before November 15 of each year during the Term. Within thirty (30) days following its receipt of the Manager's Financial Statement, the Town, upon written notice to the Manager, may elect to audit the books and records of the Manager to determine the accuracy of the Revenue Share Payment. Such audit shall be conducted by a certified public accountant with at least ten (10) years' experience in the auditing of books and records who is not compensated on a contingent fee basis. The Manager may elect to provide electronic records to the Town and its auditor."

**- Is it appropriate to include the PPP loan in the revenue share?**

- According to Sewataro Management Contract (p. 5): "Manager's 'Net Revenue' shall be defined as any and all revenues and receipts of any kind the Manager received during its fiscal year..."

- According to our accountant, "The PPP CARE's Act money is not revenue, and its inclusion in the Revenue share may not be entirely correct. Based on our discussions, we have included it in the revenue share calculation as an addition to net income from operations for the calculation of the revenue share amount due to the Town of Sudbury."

- It is our intent to do this again next year, assuming the second PPP loan is forgiven.

- The PPP loan had no impact on the fiscal management of the camp. **Sewataro Team**

**Questions for Sudbury Town Staff**

- How much time does Town staff (including Town Manager) currently spend on Sewataro-related topics? **Since the Town acquired the camp, the Facilities Director has spent on average 6 hours per month on camp issues. That's the average with no major items, some items can be quite time intensive. The Town Manager does not specifically track the amount of time on every subject, regarding Sewataro, it could be considered that between preparing for Select Board meetings, reviewing monthly reports, fielding other questions and comments, it may be fair to estimate close to 4 hours per month maximum, however, this most likely is not reached each month. The Health Department often fields questions or attends meetings relative to the Camp, this could be estimated near 3 hours, depending on the inputs and requirements. Town Manager/Hayes**
  - o What do you do?
    - **As the Sewataro Property was not purchased for conservation purposes, prior to this present request, I have not spent time on Sewataro-related matters. Conservation/Capone**
- From the Town staff perspective, what are the capital projects that should be addressed at Sewataro if any?
  - o **That depends entirely on the Town's overall plan for the property, specifically enhanced public access and potential Town operation and to what extent. Accessibility issues will be at the center of those costs. Facilities/Barletta**

Select Board members regarding  
Sewataro Dec 2021

- How much do you think they would cost?
  - **Cost would be driven by the Town's overall plan. A consultant should be engaged to determine any costs. Facilities/Barletta**
- How much would it cost to maintain the Sewataro property if there were no property manager:
  - as a camp?
    - **Town Facilities would not be able to determine that. A consultant should be engaged to determine any costs. Facilities/Barletta**
  - as open, recreational space?
    - **If the property were reverted for open space purposes, additional funds and personnel would be needed for the Town to be able to mow the property, plow the roads, and upkeep the buildings or the land would revert back to forest and the buildings would go into disrepair. The ability to take on the required management is not currently in the Conservation, Public Works and/or Facilities budgets.**
    - **The Facilities Director is the Town staff liaison to the camp operational staff. Responds to questions and advises on any issues they may have regarding interaction with Town Depts. and the public. Work with camp staff on items related to buildings, grounds and public access. Keeps Town Manager informed of camp related issues and responds to Select Board and other inquiries. Facilities/Barletta**
    - **Town Facilities would not be able to determine that. A consultant should be engaged to determine any costs. Facilities/Barletta**
- Does the Town currently have the resources/ability to maintain the Sewataro property if there is no camp operator? **From the Town Facilities Dept. perspective absolutely not. Facilities/Barletta**
  - Please describe. **Town Facilities is a very minimally staffed Dept. Facilities/Barletta**
- Are there any public health concerns associated with the property or its use?
  - If yes, can those be mitigated and how? **The Board of Health has concerns about the water meeting acceptable standards without chlorination shall be addressed with the outcomes of the way the Camp moves forward with testing and maintaining the bodies of water on the site, there are no current negative outcomes. Town Manager/Hayes**
- Are there any environmental concerns associated with the property or its use?
  - If yes, can those be mitigated and how?
    - **In addition to the chlorination and algaecide concerns expressed above, activities contained within the 1988 Level of Existing Maintenance of Pool/Ponds Program that require review and approval from the Conservation Commission include the dewatering of the fishing pond to fill the swimming beach and/or to conduct maintenance on the spillway or around the fishing pond. Filling of the swimming beach results in a temporary 3-4 foot drawdown of the fishing pond. Alternatives to filling**

**the swimming beach from the fishing pond should be evaluated. Alternatives to draining the swimming beach into Pantry Brook should also be evaluated. Conservation/Capone**

- **I believe the biggest environmental obstacle that impacts the camp operations is their current chlorination program. I am not aware of a permitting pathway for the current operation. The Camp Manager is currently looking into ways that the operations can be modified to meet Regulations. Any structural modifications and/or chemicals that will be proposed within wetland resource areas will require review under a Notice of Intent application with the Commission. I am confident that alternatives will be found that can be permitted by the Conservation Commission. Conservation/Capone**
- Will the enhanced access proposals (swimming) have any impact on water quality or the environment?
  - **Presumably there is a high potential for impacts to water quality but the simple answer is we do not know. There has not been a water quality monitoring program that evaluated whether current operations have any negative impacts and whether increasing use would further degrade water quality. But in general, more people, introduces more bacteria, can increase the likelihood of algal blooms, and requires more chemicals to counteract these influences, all of which impacts water quality. The Commission would be concerned with water quality within the facility, but also water discharging from this site which creates the headwaters of Pantry Brook. Conservation/Capone**
  - If yes, can those be mitigated and how?
    - **What I would be requesting with the Notice of Intent Application, is the development of a Water Quality Monitoring Program that compares water quality directly upgradient of the site, within the swimming pool, within the fishing pond, and directly downgradient of the facility, to confirm that there is no degradation of water quality from the operation. If impacts are found, then sources of those impacts would need to be addressed. If the Monitoring Program shows no impacts, then no mitigation would be needed. I am confident that any impacts can be mitigated but it is premature to answer this question, as the Camp Manager is currently evaluating the operations and I do not know what will be proposed at this point. Conservation/Capone**
- Will the Town conduct an audit of the property manager financials? **No. The CPA's review is an official file and does not require an additional audit of the audited finances of the camp. Finance Director/Keohane**

Select Board members regarding  
Sewataro Dec 2021

- If yes, when are the results of this expected? **N/A**

**Questions for Sudbury Residents**

- Do any of your family members attend Camp Sewataro?
- If yes, how would you describe their experience at Camp Sewataro?
- What do you use the property for outside of the camp operation?
- How often do you use the Sewataro property?
- How do you feel about the current level of community access at Sewataro?
  - Please elaborate with any feedback or suggestions.
- Are you willing to pay a moderate fee for use of the property facilities?
  - How much are you willing to pay?
- What do you *like* about the Sewataro property and its current property manager/camp operator arrangement?
- What do you *not like* about the Sewataro property and its current property manager/camp operator arrangement?
- How would you like to see the Sewataro property managed and used in the future?
- What questions do you have about the current property manager/camp operator arrangement?
- Do you have any other questions about the Sewataro property?

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**Submitted by Bill Schineller:**

**These are things I would like to learn from a FlashVote on Sewataro to help inform decision about renewal.**

1) Which strategy for Sudbury do you prefer?

- Attract and retain businesses that provide significant revenue to the town and require minimal town services and have low traffic impact
- Promote more housing development in Sudbury that grows residential tax base and vehicle registrations to pay for additional town services they consume (education, road plowing, etc)
- Both

2) Do you consider the public/private partnership enabling Camp Sewataro to continue to operate as a business providing revenue to the Town and public access to the property's recreational assets during non-camp hours a Win-Win?

The Town voted to acquire Camp Sewataro in June 2019 and took ownership in October 2019. The Town immediately issued a Request for Proposals, selected a private camp operator Sewataro LLC to manage & maintain the property year round, continue the day camp on summer weekdays, and facilitate public access during non-camp hours. The town granted Sewataro LLC the same special permit to operate the camp as a business on the residentially zoned land as it has for past decades, and increased the number of camper slots by 50 per session which the operator offers as 'scholarships' to Sudbury families in need through the Town.

Select Board members regarding  
Sewataro Dec 2021

Social Worker. The camp operated successfully in 2020 (at state-mandated 1/3 capacity due to Covid) and 2021 (full capacity), and has sold out for summer 2022.

Per negotiated contract, Sewataro LLC covers all expenses, and pays the town a fixed \$120K plus a profit share each year. In 2020 (Covid year), the Town received \$120K + \$XXX = \$YYY. In 2021 (at normal 650 camp capacity), the Town received \$120K + \$338K = \$ 458K. The Town Finance Director had conservatively estimated annual revenues of \$315K / year. (For reference, this is comparable to, exceeds the commercial tax which Sudbury Farms plaza paid the Town in 2021 of \$309K. Another point of comparison, Bosse paid town \$182K taxes in 2021.)

Additionally, Sewataro LLC's community liaison facilitated two large town-wide events each year, free use of facilities by ZZZ groups, including scouts, HOPE Sudbury fundraisers, Food Pantry drives. LS Adult Education classes and several local businesses have used the property for outdoor performances and classes at no charge with the Town's permission. The Town is considering a nominal fee schedule for reservations going forward.

Sewataro has proposed facilitating public outdoor swimming starting 2022.

The Town's debt obligations average \$667K through the year 2041 after which the property will be fully paid off. Under the current arrangement, the Town incurs zero operating costs, as Sewataro LLC maintains and makes improvements to the property year round.

Do you consider this a Win-Win

- Yes
- No

3) Which would you prefer for the future of Sewataro?

- continue the public/private partnership described in #2, a hybrid of generating revenue for the Town, and facilitating public access to unique open space and recreation assets (well manicured picnic area, courts, outdoor swimming, fishing, pavilions). Significant revenue from business, no additional residential tax impact.
- transfer responsibility for maintenance, operation, insurance, and programming at Sewataro to Town staff. Increase taxes and town staffing to provide these services in Town operating budget. Discontinue Camp Sewataro in its current form.
- Pursue developing housing on Sewataro land. Attempt to recoup Town's acquisition costs. Raise additional taxes necessary to provide town services and education for new residents and accommodate increased student population. Discontinue Camp Sewataro and give up business revenue stream, returning to residential taxation model.

4) Would you be in favor of Town divesting any of its other open space acquisitions which are currently non-revenue generating with little to no public access, and encouraging development of additional housing on these properties? Select all that apply:

- Broadacres Farm
- Town Center
- Johnson Farm
- None of the above.

5) Do you think supervised public outdoor swimming at the Town's Sewataro property would be appealing to Sudbury residents, including those on waiting lists for Sudbury Swim & Tennis and Greenwood Swim Club in Sudbury.

- yes
- no