

HULL CONSERVATION COMMISSION

253 Atlantic Avenue, 2nd floor Hull. MA 02045

Phone: 781-925-8102

TUESDAY, May 25, 2021

Held virtually via GoToMeeting

Fax: 781-925-8509

Members Present:	Paul Paquin, Chair, Katherine Jacintho, Tammy Best, Lou Sorgi, Sam Campbell, Paul Epstein
Staff Present:	Sarah Clarren, Assistant Conservation Administrator
Minutes:	Upon a motion by P. Epstein 2nd by K.Jacintho, and the below roll-call vote of 6-0;
	Jacintho – aye; Paquin – aye; Campbell – aye; Epstein – aye; Best – aye; Sorgi – aye
	It was voted to: Approve the Minutes of April 27, 2021

6:01 Call to order

P. Paquin read aloud the charges of the Conservation Commission.

6:10 28 C St., Map 18/Lot 009 Opening of a Public Hearing on the Request for Determination of Applicability filed by David Sullivan for work described as replace and extend existing deck

Representative: D. Sullivan Abutters/Others: No one spoke

Documents: "Mortgage Inspection Plan 7/17/2012", annotated 2021 "28 C St Deck Remodel", hand drawn, n.d., 2 pp.

D. Sullivan presented the project as described above.

- Upon a motion by P. Epstein 2nd by L. Sorgi and a vote of 6-0
 - It was **voted** to:
 - Close the Public Hearing and have the Department issue a Negative Determination of Applicability.

Jacintho – aye Epstein – aye Paquin– aye Campbell – aye Best – aye Sorgi – aye

6:15 64 Central Ave. Map14, Lot 032 Opening of a Public Hearing on the Notice of Intent filed by Ambassador Pool Distributors for work described as proposed above-ground swimming pool.

Representatives: J. Vasquez, R. Silverman

Abutters/Others: No one spoke

Documents: "Colonial Land Surveying Co Plot plan (annotated 2021) 06/06/2016" "Kayak Bools 12'x20'Medel Plans 06/20/2020" 13 pp

"Kayak Pools 12'x20'Model Plans 06/20/2020", 13 pp.

J. Vasquez presented the project as described above. The Chair asked if there has been any a provision or discussion with landowner about water disposal. Vasquez stated that the owners will not be using chlorine. Silverman stated they will be using salt water. Dept Assistant discussed local bylaw about prohibited disposal of pool water. Order of Conditions to be sent to homeowner who will email mailing address for receiving OOC recording at the Registry of Deeds. One Special Condition was added as follows:

• Pool water shall not be discharged to nearby stormwater catch basins, nor emptied onto the ground. Water will need to be contained and removed for disposal off site in a manner that is consistent with all pertinent local, state, and federal regulations. This condition is ongoing and will not expire at the end of three years, nor with the issuance of a Certificate of Compliance.

Upon a motion by P. Epstein 2nd by S. Campbell and a vote of 6-0

It was **voted** to:

Close the Public Hearing and have the Department **issue** an Order of Conditions.

Epstein – aye Paquin - aye Campbell - aye Best – aye Sorgi – aye Jacintho - aye

6:25 42 Packard Ave., Map 24/Lot 164 Opening of a Public Hearing on the Request for Determination of Applicability filed by **Alexander Kuklin** for work described as **install vinyl fence elevated 6**" from the ground.

Representatives: Alexander Kuklin

Abutters/Others: No one spoke

Documents: "Plan for Fence Installation, 04May2021" initialed LK

A. Kuklin presented the project as described above. Fence repaired/installed by neighbor, not applicant. Applicant is looking to install fence to the right of property and would like it to be wood panels instead of proposed vinyl. One Commissioner stated the fence needs to be installed such that panels are elevated 6 inches above grade.

- Upon a motion by P. Epstein 2nd by L. Sorgi and a vote of 6-0;
 - It was voted to:

Close the Public Hearing and have the Department **issue** a Negative Determination of Applicability.

Paquin– aye Campbell – aye Best – aye Sorgi –aye Jacintho – aye Epstein – aye

6:31 205 Samoset Ave. Map 19, Lot 017 Continuation of a Public Hearing on the Notice of Intent filed by Jay Shoostine for work described as 5'x10' deck with stairs.

Representatives: No representative present

Abutters/Others: no one spoke

Documents: "Existing and Proposed Conditions Plan" – Nantasket Survey Engineering, LLC – 5/3/2007, last revision 4/30/2021

Clarren explained that at the previous meeting (5/11) the Commission had no issues with the proposed project but no OOC was considered because there was no DEP permit number issued. A DEP permit number has since been received.

- Upon a motion by P. Epstein 2nd by L. Sorgi and a vote of 6-0;
 - It was **voted** to:

Close the Public Hearing and have the Department **issue** an Order of Conditions.

Campbell – aye Best – aye Sorgi –aye Jacintho – aye Epstein – aye Paguin - aye

6:34 620 Nantasket Ave., Map 19/Lot 129 Opening of a Public Hearing on the Notice of Intent filed by Paul & Rachael Sordillo for work described as install crushed stone driveway; two retaining walls; paver walkway; repair existing driveway, walls, steps, and pavement.

Representatives: P. Sordillo

Abutters/Others: no one spoke

Documents: "Existing and Proposed Conditions Plan" – Nantasket Survey Engineering, LLC – 04/28/20 "620 Nantasket Work Narrative" n.d.

P. Sordillo presented the project as described above. Remove old flagstone and replace with new pavers. Repair existing wall, add granite cap. Applicant wishes to overlay existing asphalt with new and repair cracks

Add drainage using crushed stone as indicated and add new wall as shown on plan. Commission asked more about new proposed wall. Plan seems to show a gap in existing wall (facing building, on the right) that will be replaced as a result of part of the new proposed wall. A Commissioner asked about the basketball court

Two Special Condition was added as follows:

- The permeable driveway shall remain permeable in perpetuity. This condition is ongoing and will not expire at the end of three years, nor with the issuance of a Certificate of Compliance.
- The drainage area shall be maintained in good working order in perpetuity. This condition is ongoing and will not expire at the end of three years, nor with the issuance of a Certificate of Compliance.

Upon a motion by P. Epstein 2nd by L. Sorgi and a vote of 6-0

It was **voted** to:

Close the Public Hearing and have the Department **issue** an Order of Conditions. Best - ave Sorgi - aye Jacintho - aye Epstein – aye Paquin - aye Campbell - aye

6:47 323 Beach Ave., Map 13/Lot 025 Opening of a Public Hearing on the Notice of Intent filed by Nylson Andrade for work described as install 1,375sq ft. of pavers.

Representatives: B. Kenerson Abutters/Others: no one spoke Documents: "Existing and Proposed Conditions Plan" – Nantasket Survey Engineering, LLC – 03 /31/2020" Annotated 2021. "[Picture of Decking]" – n.d. "Patio Plan" – n.d. "Outdoor Dining Structure" – MSA – 2/1/2021

The Commission noted that no DEP File Number has been given and therefore they cannot close the hearing. Clarren stated that there appeared to be issues with the abutter notifications. B. Kenerson stated that abutters had been notified, but proof of mailing was not provided. The Commission determined not to open the hearing for lack of proof of notification.

6:51 78 Clifton Ave. Map 32, Lot 059 Continuation of a Public Hearing on the Notice of Intent filed by Kyle & Casey Von Iderstein for work described as replace existing deck and proposed expansion of house foundation to support house remodeling project.

Representatives: K Von Iderstein J. Hannon D. Haight Abutters/Others: no one spoke Documents: "Proposed Addition 78 Clifton Ave" 03/21/21 "Plan of Land"08/30/20 "Home Addition Von Iderstein Residence 05/20/21 Revisions" 8 pp.

Before entertaining discussion of this project, the Commission pointed to a number of possibly unpermitted work and potential non-compliance with the recent order of conditions regarding the armoring of the coastal bank. Clarren provided a brief history of permitting for this property based on office records and Building Dept permits. A 1980 RDA was submitted regarding the construction of the original house. The Commission issued a negative determination and the 1980 applicant obtained a building permit and constructed home. For the record, the building was located 21 ft from the top of coastal bank. In addition, another RDA to construct stairs down the bank to the Bay was submitted in 1981. The Commission did issue a determination for the stairs as they requested further information. In 1992, a shed was installed via a permit from the Building Dept. but no record with the Commission. In 2001, two sets of plans from the Building Dept. show a building permit for the home addition and a negative determination issued by the Commission. Further, a building permit was issued by the Building Dept. for the cantilevered deck, with a stamped statement stating that an RDA be sought from the Conservation Commission. No record of an RDA exists with the Conservation Dept. Hannon stated that the existing cantilevered deck is proposed to be removed which would render the non-permitted deck moot and the proposed new cantilevered deck will have minimal impact on the coastal bank. One Commission was concerned about the impact the deck overhang would have on the stability of the bank adversely shading the coastal bank vegetation. Von Iderstein stated that this deck does not shade the coastal bank. One Commission was concerned that the supports for the current deck to be demolished will remain, to which Hannon stated "no". The new proposed elevated deck will be cantilevered and will not extend out over the bank as far as the existing deck does. The proposed new foundations will support a new 2nd story addition. Mitigation is proposed to manage runoff and detailed by Hannon to include roof leaders to be directed to dry wells to allow infiltration into ground water. Hannon stated no proposed work will occur in C. 91 jurisdiction. Hannon shared an "existing conditions plan" to provide clarification as to where the current foundation exists and reviewed with the Commission what was to be demolished. Von Iderstein also stated that the proposed 2nd story will be approximately 3 ft back from the bank relative to existing. Architectural drawings show a deck post to grade which is different from the proposed structural drawings of the cantilevered deck with proposed helical anchoring. Haight and Hannon explained the location of the angular support from the helicals to deck. The Commissioners, applicant and representatives talked at length about the proposed foundation. One Commissioner noted that the footprint of the foundation, (both existing and proposed) is not going to change. The proposed new foundation is to be a four foot below grade foundation. Hannon states that the closest helical would be 10 ft from the top of the coastal bank. One Commission suggests the top of the coastal bank (especially in the NW corner) does not appear to be accurately represented on the plan. One Commissioner noted that the bank has been denuded. Hannon suggested some mitigation through planting to enhance the stability of the bank. Von Iderstein stated that they are operating under a recent permit to stabilize the bank following an approved landscape plan. One Commissioner suggested updating the plan for this project that shows the

planting that was recently permitted. Clarren shared the previously permitted landscaping plan. The Commissioners were concerned about replacing an existing slab with a 4 ft below grade foundation so close to the coastal bank. The Commission reiterated they do not permit this type of work to be within 10 ft of the top of the coastal bank. Hannon asked if the Commission would like the proposed work to be staked out on the property to assist with understanding the proposed project. Clarren listed the following on the property that was not permitted through the Commission: possibly the rear addition closest to bank, the cantilevered deck, shed, and the stairs down the coastal bank. Hannon asked if the Commission would entertain an after-the-fact RDA for the shed and the cantilevered deck. Hannon agreed to stake out the project (including where the helicals are to be placed and the extent of the overhang on the coastal bank) for another Commission site visit. A Commissioner requested that there be a clear set/version of plans that clarifies the issues raised and apparent discrepancies be provided for the next meeting. One Commission asked that the top of the bank be marked on site as well. Hannon asked if the shed could be added to this application as an after-the-fact. Clarren advised that MA DEP suggests including cross sections of the bank with a coastal bank resource delineation, and a more detailed narrative that explains how the work for this project will be conducted (e.g., stockpiling of materials). One Commissioner noted that the proposed deck is actually increased and the house is substantially larger even though it is on the same footprint.

• Upon a motion by P. Epstein 2nd by L. Sorgi and a vote of 5-0

It was voted to:

Continue the hearing to June 8th, 2021 at a time TBD.

Sorgi - aye Jacintho - aye Epstein – aye Paquin - aye Campbell - aye

7:57 67 Pt. Allerton Ave. Map 10/Lot 005 Continuation of a Public Hearing on the Notice of Intent filed by Sean Cutting for work described as construct new three story house; front porch, two rear porches, regrading, install driveway, in-ground pool, hot tub, patio.

Representatives: S. Cutting

D. Ray S. Goldkamp M. Haley B Fraizer

Abutters/Others: no one spoke

Documents: "Existing and Proposed Conditions Plan" – Nantasket Survey Engineering, LLC – 05/17/2021 "Landscape Plan –Frazier Design" "Foundation Plan, S1.1" - LaBrasser Engineering

S. Cutting presented the project as described above. Plans were updated, Haley and Aldrich geotechnical consults were hired, pool and house were staked out on site, team met with Krahforst on site prior. Goldkamp summarized geotechnical information that included observations of slope instability. The coastal bank shows no signs of slumping; bank appeared to be stable and in good condition. Haley and Aldrich looked at the plans and site from an "offset" and "proposed construction" perspectives. Offset, relative to previous structure show no increase loading, not putting in more soil, not proposing to do any regrading. H and A evaluated at the pool and house: Offset- well outside of 10 buffer, and not adding any additional load to bank. The pool loading is 1/5th of weight relative putting a house in that spot. Glacial till, which is a dense soil, makes up the coastal bank and is reasonable soil for placing these structures near the bank as proposed. Cutting showed the Commission a coastal bank transect. Old house was 2 ft off the coastal bank and the proposed project has a proposed10 ft. vegetated buffer. The proposed home will be 48 ft from the top of coastal bank. One Commissioner asked if the transects provided were vertically exaggerated. For clarification, the foundation was removed and the area backfilled. B Fraizer noted that the transect scale is 1:1 vertical to horizontal. One Commission pointed that part of the wall to the NE but not immediately adjacent to the property is failing and that condition is potentially jeopardizing the stability of the project's coastal bank. Ray stated the failing bank is 60 ft away from the proposed project property line. One Commission alerted the applicant about the Town bylaw restricting construction of a structure within 25 ft of a cliff. The applicant is aware of this bylaw and has engaged in discussions with the Building Commissioner about this issue. Clarren pointed out the isolated vegetate wetlands nearby.

Four Special Condition was added as follows:

• The permeable pavers shall be maintained to ensure permeability. This condition does not expire at the end of three years, nor with the issuance of a Certificate of Compliance.

- Pool water shall not be discharged to nearby stormwater catch basins, nor emptied onto the ground. Water will need to be contained and removed for disposal off site in a manner that is consistent with all pertinent local, state, and federal regulations. This condition is ongoing and will not expire at the end of three years, nor with the issuance of a Certificate of Compliance.
- The stability of the coastal bank shall be evaluated periodically and kept in good condition through adherence and upkeep according to the Landscape plan of record. This condition is ongoing and will not expire at the end of three years, nor with the issuance of a Certificate of Compliance.
- All work is to be done landside of the 10 foot buffer to the top of the coastal bank.

Upon a **motion** by P. Epstein **2nd** by L. Sorgi and a **vote** of 5-0 It was **voted** to: **Close** the Public Hearing and have the Department **issue** an Order of Conditions. Jacintho - aye Epstein – aye

Paquin - aye Campbell – aye Sorgi - aye

8:35 **189 Nantasket Ave., Map 37/Lot 002 & 004 Opening** of a Public Hearing on the Request to Amend the Order of Conditions filed by Nantasket Dune Holdings LLC for work described as modifications to locations of retail/service containers, surface treatments, walkways, etc.

Representatives: A. Brodsky

C. Boggi K. Skulte

Abutters/Others: Cheryl Tollistoys, S. Green

Documents: "Plan of Record for SE35-1453 11/19/19" prior to amendment request

"Layout and Materials Plan 03/26/21"

"Layout and Materials Plan Comparison Exhibit 05/21/21"

Brodsky introduced the representatives of the project and K. Skulte P. presented the amendments sought for the project as described above and introduced an updated plan as well as a narrative detailing the changes (amendments). Skulte also provided a plan showing what was permitted with the proposed amendments overlaid. Overall, the project proposes significant reduction from originally proposed and the first amended OOC, including the elimination of a number of containers that were proposed. A new wooden deck and a turf mat over an area that was simple fill. A proposed retaining wall in the rear (west) of property is no longer proposed. The 2nd mezzanine area is no longer proposed as well. The multiuse volleyball court sandy area is proposed to become a partially finished a wooden deck as shown on the new Layout and Materials plan. No change to the stormwater management system is proposed. The ADA access area is simplified because the public access and ADA parking is not needed through the special permit project. This access is now proposed to be graded and contain a natural fill. The initially proposed stage area is now proposed to be a large platform in the absence of the initially proposed container. A wire fence along the staging to the S and E. was installed after-the fact and is part of one of the amendments being sought. Grass area to the E of the stage area was eliminated, additional mulch areas added as per plans, trash locations are relocated to be more conducive to servicing and management. Some concrete stairs originally proposed are to be eliminated; in some cases replaced with mulch. A concrete pad (after-the-fact) is placed in the partial footprint of the originally demolished building. Other concrete areas were added as shown on the proposed above mentioned plans. One Commissioner asked what the area was prior to the installation of the concrete area to the north. Skulte stated that the impervious area is reduced from what was originally proposed and that the area discussed had a building that was demolished. A Commissioner asked if the fence along Nantasket Ave was 50% flow through. Skulte stated that the fence has staggered planks which allow free flow of water back and forth. One Commissioner asked that a DEP Permit sign be place along Nantasket Ave. One Commissioner asked if the bathrooms were connected properly to the sewer system to which Skulte said they were tested and were connected to the sewer system. A commissioner asked about the timing for removing the skateboard ramp. One commissioner noted that the trash containers have not been changed as proposed and the existing containment area is not adequate as it exists now. Boggi stated the trash containers were recently moved, a new servicing contractor has been engaged and these issues have been addressed. One commission asked about the cement area to the NW corner, two manhole covers exists there, another is "gridded" and are they are connected to the stormwater management system as previously permitted. Boggi responded to a commissioner's question regarding the volleyball court and stated that area will serve as a seating area to mimic a beach. No volleyball court is currently planned. Clarren stated that the drainage and utility (2019) plans should be permitted. These previous plans will remain as plans of record and the spot grades contained in the Grading, Drainage, and Erosion control plans dated 11/06/2019 remains as well. Clarren also discussed the existing stockade fence which is not 50% flow through. Boggi stated that fence will be changed to be 50%

flow through. One abutter wrote that the added after-the-effect concrete surfaces should be discussed by the Commission. Clarren showed that impervious surfaces were not greatly added to what was there. C. Tollistoys, part time residents at Horizons, asked about the parking lot being expanded. The Commission pointed out that project is not associated with this amendment request or OOC and that parcel is part of a separate project being proposed under another Notice of Intent application. S. Green asked about the GW Blvd side fence. Skulte stated that fence is still a stockade fence. A Commission stated that the amended order of condition will be condition this fence to be appropriately re-designed to be 50% flow through. S. Green asked about food trucks on site. S. Green asked about removing parking spaces from the plans and Skulte responded that parking was eliminated but some parking will be used for staging and occasionally employee parking. Parking was previously permitted but is not formally identified in the amended plans. S Green asked about the turf mat if that was to be permeable. Skulte stated that the proposed artificial turf is permeable. Brodsky pointed out the stockade fence was previously approved because it is along GW Blvd and elevated 6 inches above grade and would not impact any neighboring abutting properties. Clarren returned to the parking space discussion of originally permitted spaces and does not allow for non-permitted changes to parking locations in the portion of 0 GW Blvd that are part of this project. Skulte explained that vehicle access will be needed and some occasional employee parking is expected. Special conditions for the amended Order of Conditions will be carried forward from the original and 1st amended OOCs. Clarren stated that no changes grade shown on the plans of record carried forward from the original OOC (2019) and those spot grades remain as record for this proposed 2nd amended order of conditions.

Twelve (12) Special Conditions were added/carried forward as follows

- Inspections of the stormwater management system as a whole, and of the individual components of the system, will be carried out on a routine basis and in accordance with the schedule identified in Section 6.3 of the Operations and Maintenance Plan. Each will be inspected for sediment buildup, presence of oil, color, and structural damage. The results of each inspection will be entered into an inspection log and shall be provided to the Conservation Department. At minimum, the property owner shall provide the inspection log to the Conservation Department at the following intervals: 6 months with estimates of material accumulation rates, 1 year with estimates of material accumulation rates, 2 years and 3 years. Depending on performance, the Commission reserves the right to require further inspections to protect the resource areas. As stated in the Operations and Maintenance Plan, records of inspections and maintenance shall be up to date and available for review and inspection. This condition is ongoing and will not expire after three years, nor with the issuance of a Certificate of Compliance.
- The property owner shall keep the stormwater management systems in good working order (per the Operations and Maintenance Plan). The Commission and/or designee has the right to confirm, clarify, and require compliance with said Operations and Maintenance Plan. This condition is ongoing and will not expire after three years, nor with the issuance of a Certificate of Compliance.
- If the project goes through any additional permit process and any changes are thus required as a result, these changes must be reviewed by the Conservation Commission.
- The sand for the recreational area shall be sourced from an approved state vendor and shall meet uncontaminated sand standards.
- Fill proposed to bring the area where the remaining building is to be [and has since been] demolished (NNE property boundary) shall be no higher than surrounding grade.
- The quality and type of fill specified in Special Condition 5 shall be reviewed by the Conservation Administrator or designee prior to its application.
- Proposed fencing labeled as "Proposed 6 FT Fencing" on Plan of Record: Layout and Materials Plan Comparison Exhibit (5/21/2021) shall be 50% flow-through and elevated 6" off the ground.
- The Commission recognizes that a portion of the project extends onto 0 George Washington Boulevard. This Order only allows work on 0 George Washington Boulevard (Map 37, Lot 002) within the area shown on the plan titled "Layout and Materials Plan" dated 4/26/2021. No expansion past the area shown on the plan is permitted under this Order. Any digging, filling, or altering of land protected under the Act that extends beyond what is permitted by this Order may require an application before and approval from the Commission.
- Proposed drainage, utilities, and grades shall follow the plans approved in the first amended Order (Plans of Record entitled "Grading, Drainage, and Erosion Control Plan" dated 11/6/2019 and "Utility Plan" dated 11/6/2019). The Commission recognizes that the above ground structures and surfaces shown on the plan

entitled "Layout and Materials Plan" dated 4/26/2021 shall supersede the above ground structures and surfaces shown on the aforementioned 2019 plans.

- The Commission recognizes that as of 5/25/2021 an unpermitted skate park ramp remains onsite. The ramp is not included as part of the proposed amendments and will be removed from the site.
- As required in Standard Condition 18, "at the completion of the project, the Applicant shall submit WPA Form 8A and any or all of the following pertinent information to the Hull Conservation Commission in order to receive a Certificate of Compliance, including a Request for Certificate of Compliance (WPA Form 8A), referencing the DEP File number, a written statement from a registered Professional Engineer that the project is substantially in compliance with this document and the referenced plans, and if different from the original plan, how and where it differ, a signed and stamped as-built topographic plan from a registered Professional Land surveyor that includes as-built elevations of all drainage structures within 100 feet of any resource area and all distances and elevations of all structures within 100 feet of any resource area." If there are any deviations from the approved Plans, the Commission reserves the right to require the property owner to file for a new NOI or to request an Amended Order.
- The property owner is responsible for ensuring the above Plans of Record and the Standard and Special Conditions are followed. If any additional work or changes are proposed, prior to any further work commencing, it must first be approved by the Conservation Commission.

Upon a **motion** by P. Epstein **2nd** by L. Sorgi and a **vote** of 5-0 It was **voted** to: **Close** the Public Hearing and have the Department **issue** an Amended Order of Conditions. Epstein – aye Paquin - aye Campbell – aye Sorgi – aye Jacintho - aye

9:30 189 & 193 Nantasket Ave. & 0 George Washington Blvd. Map 37, Lots 002-004 Continuation of a Public Hearing on the Notice of Intent filed by Nantasket Dune Holdings LLC for work described as demolish existing building and construct five-story building; after-the fact clearing of 0 George Washington Blvd. and construction of a parking lot; demolish golf course and construct parking lot.

Representatives: None Abutters/Others: no one spoke

 Upon a motion by P. Epstein 2nd by L. Sorgi and a vote of 5-0 It was voted to:
Continue the hearing to June 22nd, 2021 at a time TBD. Paquin - aye Campbell - aye Sorgi - aye

> Jacintho - aye Epstein – aye

Certificate of Compliance Requests

<u>150 Cadish Ave (SE35-1560)</u>. **Motion**, Epstein **2nd** Sorgi, following roll-call vote of 6-0; Sorgi – aye; Epstein – aye; Paquin – aye Campbell – aye; to have the Department **issue** a Certificate of Compliance.. 220 N Truro (SE35-1378) No action taken, materials still needed

Continued and New Business

None discussed

9:41 Upon a **motion** by P. Epstein and **2nd** by L. Sorgi and the below roll call **vote** of 6-0; It was **voted** to: End the Open Session.

Paquin – aye Campbell - aye Sorgi - aye Jacintho -aye Epstein - aye