

# EcoTec, Inc.

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February 3, 2015

Tom Tidman, Natural Resources Director

Acton Conservation Commission

472 Main St.

Acton, MA 01720

VIA EMAIL: [ttidman@acton-ma.gov](mailto:ttidman@acton-ma.gov)

Re: Notice of Intent, 12 Summer Street, Acton

Subject: 5th Review Letter: Revised Plans and Replication Specifications

Dear Mr. Tidman and Commission Members:

This letter is a follow-up to my previous comment letters relative to the Notice of Intent (“NOI”) filing at 12 Summer Street, Acton. On February 2, 2015 I received via email from Goddard Consulting LLC (“Goddard”) the following materials:

- a. Wetland Replication Plan (narrative) from Goddard revised February 2, 2015 with seed mix specification;
- b. NOI Plans by R. Wilson Associates: 8 sheets revised (“floodplain compensation”) February 2, 2015. Note that the plan copies that I received via email were signed and stamped; and
- c. Clarifying email from Rachel Watsky of Goddard Consulting summarizing plan changes. Several of the plan changes related to line type and section details which serve to make the plans more legible. The implications of additional plan changes are summarized below.

My December 3, 2014 Review Letter #4 included a summary of outstanding items. The five outstanding items from that letter are provided below in **bold**, followed *in italics* by a summary of my review of the recent materials related to each:

**1. Incremental Bordering Land Subject To Flooding (“BLSF”) impact and mitigation tabulation, to ensure compliance with the BLSF performance standard;**

*Plotting of the floodplain along the length of the site, using reasonable interpolation between mapped FEMA floodplain increments, had previously been provided. Sheet 8 of the revised plans includes detailed plan sections with BLSF impact area and mitigation area footprint and volume calculations. These calculations indicate that the BLSF mitigation provided is within the same +/- 1 foot elevation increment as the filled BLSF. I also note that the Bordering Vegetated Wetland (“BVW”) replication area at the upstream end of the site would provide additional floodplain mitigation at the upper end*

*of the site floodplain (due to roughly 1,400 sf excess BVW replication relative to proposed BVW fill). Therefore, it is my opinion that the mandatory BLSF incremental storage performance standard (cited in my 4<sup>th</sup> review letter) is met and the general wetland interests of Flood Control and Storm Damage Prevention are protected by the proposed project design.*

**2. Detail of the total footprint, including construction access, of the BLSF mitigation areas;**

*The BLSF mitigation area, including side slope grading, is provided on the plans. Although construction access to the area is not specified, the logical access to the area at the eastern end of the proposed BLSF mitigation area is apparent and would result in minimal additional disturbance relative to what is depicted on the plans. If the Commission votes to approve the project, I suggest a condition requiring plan revisions to expand the designated limit of work (sheet 7) to include access to the BLSF mitigation area and to adjust the erosion control barriers in this area to accommodate construction access.*

**3. Restoration specifications (soil, vegetation, construction methodology) for the proposed BLSF mitigation areas;**

*This information has been provided in the Wetland Replication Plan (narrative) from Goddard revised February 2, 2015 and appears sufficient.*

**4. Wildlife habitat evaluation for BLSF (or a demonstration that the threshold for an Appendix A and/or Appendix B Wildlife Habitat Evaluation is not exceeded);**

*The revised plans note that the BLSF impact area is  $70 + 540 + 380 = 990$  sf. Although the calculation is not provided, by my plan scaling, this area is not more than 10% of the BLSF on the site. Therefore, a Wildlife Habitat Evaluation is not required under 310 CMR 10.57(4)(a)3.*

**5. Modifications to the Wetland Replication Plan (the revised location requiring less disturbance to existing grades and woody vegetation was provided prior to my review letter #4).**

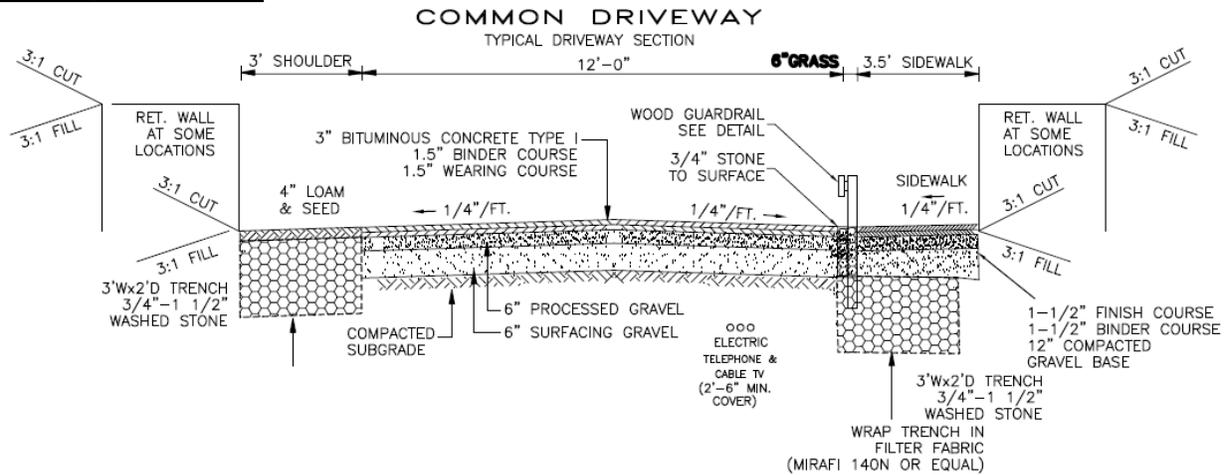
*The replication and restoration specifications have been revised and expanded to address all of my comments in this section. Changes are related to depth of topsoil, composition of topsoil, plant sizes in the BVW replication area, and the addition of woody vegetation plantings within the path restoration area.*

Additional Comment:

I have also repeatedly questioned the need for the paved asphalt sidewalk. The sidewalk remains on the proposed plans, and includes a 3 foot wide by 2 foot deep infiltration trench (similar to the infiltration trench on the opposite side of the proposed driveway). Water flow to the infiltration trench is via a 6 inch wide stone connecting channel to the ground surface between the sidewalk and the driveway. This narrow stone conduit would be fairly difficult to construct, requiring careful oversight. I also note that the Typical Driveway Section (see plan section pasted below) still also notes that the 6 inch strip between the sidewalk and the driveway is to be grass. If the

Commission votes to approve the project, I suggest a condition requiring plan revision to remove the notation that the 6 inch wide strip be planted with grass.

**Sheet 5 plan section:**



I hope that this information is helpful to the Commission in your continued review. Please contact me if you have any questions concerning this or other matters.

Sincerely,

Paul J. McManus, LSP, PWS  
President

cc: Goddard Consulting – by email