



Town of Ashland

M A S S A C H U S E T T S

Comments on Filing

Date: 7/17/2019

Application Type: NOI

File No. 95-931

Applicant Name: Mass DOT

Project Address: Route 126 (Pond Street)

Comments:

1. On the NOI, the replacement number of BLSF must match the number of flood storage lost under the proposed alteration.

Response

2. On the NOI, the replacement number of Bank must match the number of total area that is disturbed under the proposed alteration.

Response

3. The narrative mentions an exemption under the Stormwater Management Permit (pursuant to Chapters 247 and 343, of the Code of the Town of Ashland). Note that this should be discussed at the first hearing with the Conservation Commission.

Response

4. The narrative does not mention the interests of the Wetlands Protection Act, nor does it mention how these interests will be protected under the proposed project. In addition, the project should contribute to the interests of the Wetlands Protection Act. These comments (4.) should be addressed in an addendum to the Notice of Intent.

Response

5. Mitigation measures should be discussed pursuant to 310 CMR 10.53. (3).

Response

6. When will the PCN and WQC be submitted to the appropriate agencies? Once submitted, please provide an electronic copy for the file.
- Response
7. The flow duration and watershed size of Stream Stats data should be submitted for all intermittent streams.
- Response
8. Beaver Dam Brook is mentioned in the narrative, via the BLSF section. However, in Section 2.15 of the narrative, it mentions that there is no Riverfront Area in the vicinity of the project. Please clarify.
- Response
9. In 2.2.1 of the narrative, installation of Erosion and Sediment Control BMPs is mentioned, but the types used are not described until Section 10.1.1 and 10.1.2. Please describe the types of erosion controls to be used (no hay).
- Response
10. In 2.2.1 of the narrative, certain performance standards for bank will be met. Please describe how each of these performance standards will be met. Note that all of the standards should be listed.
- Response
11. Permanent impacts to wetlands are 4,507 square feet, while the replication areas appear to total 4,960 square feet. What was the reasoning for the sizing of the replication areas being greater than that of permanent impact areas?
- Response
12. Were stream crossing standards taken into consideration for this project?
- Response
13. Performance standards for all impacted resource areas should be listed in the narrative with an explanation under each standard describing how that standard is being met.
- Response
14. Wetlands Y and Z are shown in Figure 5, but they are not mentioned in the beginning of Appendix A.
- Response
15. DEP Data forms were submitted, but there is no indication on each form to show which wetland area each form represents. The forms should have a clear label on them corresponding to the wetland system that the form represents. In addition, the forms are missing the Indicator category.

Response

16. At the top of the Special Provision Appendix (pg.67), a reference is made to "Item 755.7". What is this item, and where does it come from?

Response

17. In Appendix C (Special Provisions), a wetland contractor is mentioned, and a wetland specialist (pg.67) is mentioned. Please describe the difference. What are the qualifications, who hires/contracts them and for what purposes?

Response

18. It appears that LID site design has been taken into consideration for the design of this project, specifically by "minimizing disturbance to existing trees and shrubs". Were other methods taken into consideration? If so, which ones? If they were ruled out please explain why.

Response

19. On page 16 of the Stormwater Management Report, a description is missing regarding Drainage Area EDA-14B

Response

20. CAD files and pdf shall be submitted to the Conservation Agent, Maeghan Dos Anjos. The CAD files will need to be georeferenced to NAD State Plane 83 feet. After speaking with Danielle Spicer on 7/15/2019, a condition will be needed for the Order requiring CAD files at the time of the preconstruction meeting.

Response

21. Increases in peak discharge rates are summarized in section 4.2.3 of the Stormwater Report. DP-8 is listed as having an increase, but the table 4.3 appears to contradict that. Please verify DP-8 within the table and the third paragraph of 4.2.3 to confirm accuracy of information presented.

Response

22. DP 13 is missing from Table 4.3

Response

23. A small impact is mentioned to a W-1 which will result in an increase in depth of 1.24 inches. Your report states that this occurs by a model which omitted a connection to another downstream wetland that has a total area of 202 acres. Please explain this further. Which connection to another downstream wetland was omitted and why was it omitted as part of that model?

Response

24. Discharge point W- Y (14B) shows an increase in peak rate via Table 4.3, but is not mentioned or described in 4.2.3.
- Response
25. Per standard 2 of the Massachusetts Stormwater Handbook, BMPs must be installed to attenuate discharges where an increase is present within the 100 year 24 hour storms. BMPs are restricted due to site constraints (spacing, high groundwater etc.). This should be discussed with the Commission as you are charged with meeting this standard at the maximum extent practicable.
- Response
26. Recharge is not being met at all. The narrative states that you do not have enough space, yet the added impervious area is over 80,000 square feet. Did you consider off-site BMPs? Are there other options available?
- Response
27. Under Section 6.1 of the Stormwater Report, it is mentioned that the long term pollution prevention measures will be combined with the Town of Ashland's Department of Public Works. However, in the Operations and Maintenance Plan, Mass DOT is responsible for Route 126. Please clarify.
- Response
28. Under Section 6.4 of the Stormwater Report, Wauhskum Pond has an impairment of Phosphorous. However, according to the Massachusetts (Year 2016) Integrated List, there are more impairments to Wauhskum Pond, and consist of turbidity, dissolved oxygen, non-native aquatic plants, and aquatic plants (Macrophytes). Planning and design considerations should consider BMPs to reduce the impairments to Wauhskum Pond. It was explained that factors from the site constraints made planning for BMPs arduous. Please explain which structural BMPs were considered.
- Response
29. Was a site inspection done to look at the existing outfalls, and culverts? If so, what is the quality of these outfalls, pipes, culverts, headwalls and other drainage structures? Will any of these need to be improved as part of the project?
- Response
30. Under Section 9 of the Stormwater Report, catch basins with a minimum depth of 4 feet are to be specified, and all outlets will have hoods and traps. Are these specified on the plans?
- Response
31. Figure 7: Proposed Watershed Plan is difficult to read given the scale, and many features of the map. Please provide a more legible watershed plan, or zoom into the busy areas.

- Response
32. Section 10.1.1 states that the Contractor will be responsible for adding additional measures for erosion or drainage. If needed, the Conservation Agent and Commission should be notified.
- Response
33. Section 10.1.1 states that runoff from disturbed areas will go through a sedimentation process. Please explain that process.
- Response
34. Section 10.2.3 states that personell will be designated by the job site superintendant to designate spill prevention training and that the names will be posted on site and within the office trailer. Please note that the names should also be submitted to the Conservation Commission as well.
- Response
35. Section 11 of the Stormwater Report states that "MassDOT will continue to be responsible for the operation and maintenance of the stormwater management system using current Department practices which include litter pick-up and catch basin cleaning." What is the "Department"?
- Response
36. Note that the Conservation Commission will not be able to issue a Certificate of Compliance until it has verified that there are no illicit discharges, and that the Illicit Discharge Statement is compliant from Standard 10 of the Storwmater Management Handbook.
- Response
37. The Draft Operations and Maintenance Plan, dated April 2019 is missing how future owners will be notified of the O&M, an estimated budget for mainteance operations, a description of public safety features, and a plan to scale that displays BMPs on the site.
- Response
38. The 25 foot No Disturb Zone must be shown on all plans that contain wetlands, banks, or a waterbody as pursuant to Chapter 348-3 per the Wetlands Protection Bylaw
- Response
39. The plans should show drainage lines, in addition to culverts as well as maholes and catch basins.
- Response
40. The flow direction of the streams should be reflected on the plans .
- Response
41. The 100' Buffer Zone appears to be missing on Sheet 18 to the north of the wetland series B and C.

- Response
42. Sheet 19 is difficult to make out the wetland flag numbers and to differentiate them from the Bank symbols, and other writings and markers.
- Response
43. A line appears to be missing between WF Number L18 and L19 on Sheet 22.
- Response
44. Sheet 27 is hard to read the flags of the bank and wetland system.
- Response
45. Elevations/contours are not on the plans. On that note, what is the elevation for zones AE within the applicable project sheets? Please include all elevations for all zones.
- Response
46. A profile view should be submitted for all sheets.
- Response
47. According to the National Wetland Plant List developed from the Army Corps of Engineers (2016), the *Ostrya virginiana* is a Faculative Upland plant. The *Ostrya virginiana* is listed in the replication chart on Sheets 181, 183 and 184.
- Response
48. Note that all plants proposed within the jurisdiction of the Conservation Commission shall be native to the northeast region.
- Response
49. Inverts should be shown of pipes.
- Response
50. A pipe or culvert appears to be proposed within Algonquin Trail and would hydrologically (by way of flow) connect the replication area with Wetland system "L". Please confirm if a pipe or culvert is proposed and revise the plans to reflect this, if necessary.
- Response
51. Per 10.53 (3) of the Wetlands Protection Act, were any reasonable alternatives reviewed so that impacts could be minimized from the work? If so, what were the alternatives?
- Response
52. Certain wetland flags, bank flags, and floodplain are hard to differentiate given all the other details on the sheets. Please provide an insert zoomed into these areas.
- Response

53. The General Notes of the plan set stated that some wetland systems were delineated in 2014, while others were delineated in 2018. Which wetland systems were delineated in 2014, and which systems were delineated in 2018?

Response

54. Note that the General Notes of the plan set states that contractors are responsible for the protection of private property markers. While not jurisdictional to the Conservation Commission, I recommend ensuring that these markers are placed on the construction plans that are submitted to contractors.

Response

55.

Response