

**EcoTec, Inc.**  
**ENVIRONMENTAL CONSULTING SERVICES**  
**102 Grove Street**  
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**508-752-9666 – Fax: 508-752-9494**

May 22, 2024

Littleton Conservation Commission  
37 Shattuck Street  
1st Floor, B100  
Littleton, MA 01460

Re: 4 Spectacle Pond Road Notice of Intent  
File #        (not yet issued)

Subject: Supplemental information

To the Commission:

This letter references a revised site plan (revision date 5/21/2024) provided by Dillis and Roy for the above-referenced project. Changes to the plan include:

- Slope restoration, road shoulder grading, and boulder protection (from neighbor's plowing) along the access road;
- Revised well location to accommodate required Board of Health landfill offset;
- Reconfigured building and driveway; removes all work from vegetated portions of the 50-foot Buffer Zone;
- Revised stormwater management system to accommodate building and driveway modifications, including a small additional stormwater basin located to the north of the proposed driveway;
- Notation on the plans of an area of non-degraded Riverfront Area ("RFA") defined by EcoTec at the front of the site (described below) proposed to be altered, and an associated proposed RFA restoration area (also described below).

Proposed Work in Riverfront Area:

Almost all of the proposed work footprint consists of areas of existing unvegetated former gravel pit. These areas are designated as "degraded" RFA in accordance with 310 CMR 10.58(5). Upon further review, EcoTec has identified and delineated a small portion of the lot within the proposed work area at the front of the site which contains a narrow remnant of apparently native soil and an area that has been altered from a natural condition by earthwork and dumping, but has some variable topsoil development and placement. Portions of this latter area could potentially be characterized as "degraded" in accordance with the "abandoned dumping ground" provision of the degraded definition, however the revised plan delineates these areas within the conservative limits of this non-graded area of RFA. The RFA redevelopment provisions at 310 CMR 10.58(5)(f) state that:

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*“When an applicant proposes restoration on-site of degraded riverfront area, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d), and (e) at a ratio in square feet of at least 1:1 of restored area to area of alteration not conforming to the criteria. Areas immediately along the river shall be selected for restoration. Alteration not conforming to the criteria shall begin at the riverfront area boundary. Restoration shall include:*

1. *removal of all debris, but retaining any trees or other mature vegetation;*  
Comment: No vegetation is located here. Any debris will be removed.
2. *grading to a topography which reduces runoff and increases infiltration;*  
Comment: Such grading is proposed.
3. *coverage by topsoil at a depth consistent with natural conditions at the site; and*  
Comment: Suitable topsoil cover is proposed.
4. *seeding and planting with an erosion control seed mixture, followed by plantings of herbaceous and woody species appropriate to the site.”*  
Comment: A planting plan is provided below.

Dillis and Roy engineers determined the non-degraded RFA area at the front of the site (plan sheet C1.1) is 3,880 sf, and that the building and grading proposed alters 2,840 sf of this area. Restoration of degraded RFA in accordance with the above provision is proposed (plan sheet C2.1) with an area of 3,412 sf (120%). Proposed restoration specifications are attached.

#### Waiver request

As outlined section 4.2 of the Littleton Wetland Regulations, most activities are prohibited in the 50-foot Buffer zone to BVW or Bank (“no disturbance area”). A waiver of this provision is proposed in three (3) locations which are located within the limits of existing gravel pit berm and cut slope:

1. Proposed slope repair and road shoulder modifications along the access road (work requested by the Commission);
2. RFA restoration planting in the north corner of the site; and
3. Proposed stormwater management north of the proposed driveway.

Bylaw Regulations Section 4.2(2) states that:

*“In the judgment of the Commission, any new activity (other than travel by foot or nonmotorized vehicle or removal of invasive vegetation using proper methods) or structure within 50 feet of a Bank or BVW is likely to alter the Bank or BVW.”*

It is EcoTec’s opinion that this “likely to alter” presumption is not applicable to the locations noted, because the subject areas consist of unvegetated former gravel pit or slope along the access road altered by the neighbor’s plowing.

Therefore, a limited waiver allowing these three project components is requested.

We look forward to meeting with the Commission regarding this filing. If you have any questions, please feel free to contact me at any time.

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Cordially,  
ECOTEC, INC.



Paul J. McManus, PWS  
President

C: DEP-CERO  
Applicant: Steven Breitmaier, Brite Excavating

Enc: Proposed RFA Restoration specifications

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### **Proposed Riverfront Area Restoration Specifications**

**4 Spectacle Pond Road**

**Littleton, MA**

**Prepared by: Paul J. McManus, SPWS – EcoTec Inc.**

**5/22/2024**

As indicated on the site plan by Dillis and Roy, an area in the northern portion of the site which is located within the obvious cut slope of the former gravel mining operation is proposed to be renaturalized from its current condition in accordance with the provisions of 310 CMR 10.58(5)(f):

*“When an applicant proposes restoration on-site of degraded riverfront area, alteration may be allowed notwithstanding the criteria of 310 CMR 10.58(5)(c), (d), and (e) at a ratio in square feet of at least 1:1 of restored area to area of alteration not conforming to the criteria. Areas immediately along the river shall be selected for restoration. Alteration not conforming to the criteria shall begin at the riverfront area boundary. Restoration shall include:*

- 1. removal of all debris, but retaining any trees or other mature vegetation;*
- 2. grading to a topography which reduces runoff and increases infiltration;*
- 3. coverage by topsoil at a depth consistent with natural conditions at the site; and*
- 4. seeding and planting with an erosion control seed mixture, followed by plantings of herbaceous and woody species appropriate to the site.”*

The proposed restoration area is 3,412 sf (see plan sheet 2.1).

The following steps are proposed:

1. The subject area will be graded relatively smooth using common borrow mineral soil. Where steep cut slopes exist at the perimeter of the area from the former gravel mining operation, soil will be added to reduce these slopes to a maximum grade of 2.5:1 +/- to allow for topsoil placement;
2. A layer of 6-inches of topsoil will be spread throughout the restoration area, including the graded side slopes. Either screened or unscreened topsoil may be used;
3. Woody plantings will be placed within the restoration area as detailed in Table 1, below. Native species only are proposed to be planted.
4. The area will be seeded with a native herbaceous seed mix such as New England Conservation/Wildlife Mix (see spec sheet attached) or substitute approved by the Conservation Commission representative in accordance with the supplier's recommended application rate.
5. A row of boulders will be placed across the southern edge of the restoration area, to permanently delineate the area and prevent accidental encroachment.

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**Table 1: RFA Mitigation Area Woody Planting Plan**

<b>SPECIES; SIZE; SPACING</b>	<b>NUMBER</b>
<b>Shrubs;</b> min 1 gal container; Hazelnut ( <i>Corylus americana</i> ) Meadowsweet ( <i>Spirea latifolia</i> ) Highbush blueberry ( <i>Vaccinium corymbosum</i> ) Grey dogwood ( <i>Cornus racemosa</i> ) Nannyberry ( <i>Viburnum lentago</i> ) Witch hazel ( <i>Hamamelis virginiana</i> ) Maple Leaf Viburnum ( <i>Viburnum acerifolium</i> ) Sweet pepperbush ( <i>Clethra alnifolia</i> ) Silky dogwood ( <i>Cornus amomum</i> )	100*
<b>Trees;</b> Min 2 gal container White pine ( <i>Pinus strobus</i> ) Oak (any combination of the species listed below) northern red oak ( <i>Quercus rubra</i> ), northern white oak ( <i>Quercus alba</i> ), black oak ( <i>Quercus velutina</i> )	10 10

All plants will be planted in clean topsoil and mulched with composted, native leaf litter or straw mulch at a depth of two (2) inches within 2-feet of the planted stems to deter herbaceous and weedy growth in the immediate vicinity of woody specimens.

# NEW ENGLAND WETLAND PLANTS, INC

820 WEST STREET, AMHERST, MA 01002

PHONE: 413-548-8000 FAX 413-549-4000

EMAIL: [INFO@NEWP.COM](mailto:INFO@NEWP.COM) WEB ADDRESS: [WWW.NEWP.COM](http://WWW.NEWP.COM)

## New England Conservation/Wildlife Mix

Botanical Name	Common Name	Indicator
<i>Elymus virginicus</i>	Virginia Wild Rye	FACW-
<i>Schizachyrium scoparium</i>	Little Bluestem	FACU
<i>Andropogon gerardii</i>	Big Bluestem	FAC
<i>Festuca rubra</i>	Red Fescue	FACU
<i>Sorghastrum nutans</i>	Indian Grass	UPL
<i>Panicum virgatum</i>	Switch Grass	FAC
<i>Chamaecrista fasciculata</i>	Partridge Pea	FACU
<i>Desmodium canadense</i>	Showy Tick Trefoil	FAC
<i>Asclepias tuberosa</i>	Butterfly Milkweed	NI
<i>Bidens frondosa</i>	Beggar Ticks	FACW
<i>Eupatorium purpureum (Eutrochium maculatum)</i>	Purple Joe Pye Weed	FAC
<i>Rudbeckia hirta</i>	Black Eyed Susan	FACU-
<i>Aster pilosus (Symphyotrichum pilosum)</i>	Heath (or Hairy) Aster	UPL
<i>Solidago juncea</i>	Early Goldenrod	

PRICE PER LB. \$39.50 MIN. QUANTITY 2 LBS.

**TOTAL: \$79.00**

APPLY: 25 LBS/ACRE :1750 sq ft/lb

The New England Conservation/Wildlife Mix provides a permanent cover of grasses, wildflowers, and legumes

For both good erosion control and wildlife habitat value. The mix is designed to be a no maintenance seeding, and is appropriate for cut and fill slopes, detention basin side slopes, and disturbed areas adjacent to commercial and residential projects.

New England Wetland Plants, Inc. may modify seed mixes at any time depending upon seed availability. The design criteria and ecological function of the mix will remain unchanged. Price is \$/bulk pound, FOB warehouse, Plus SH and applicable taxes.