

July 8, 2024
6233

Littleton Conservation Commission
37 Shattuck Street
Littleton, MA 01460

**Re: Notice of Intent
4 Spectacle Pond Road
Littleton, MA**

Dear Commission Members,

Our office is in receipt of Green International Affiliates, Inc. updated peer review comments dated June 28, 2024 for the above referenced project. On behalf of the applicant, Steven Breitmaier of Brite Excavating, Dillis and Roy provided revised plans and Stormwater Report for the project along with responses to Green's Peer Review Comment Form on July 5, 2024.

Below are additional details to provide clarification to certain comments which have been deferred to the Commission. For clarity, the numbering corresponds to Green's Peer Review Comment Form with Green's comment in *italics* and comment following in plain text:

4/4A There are proposed grade changes within the 50' No-Disturbance Area. No activities or work is permitted other than foot or non-motorized vehicle passage and removal of invasive vegetation. Please revise to keep work outside the 50' No-Disturbance area or provide reasoning for why this cannot be done. / We defer to the Conservation Commission if this is acceptable.

Grade changes within the 50' No-Disturbance are limited to repair of the slope and shoulder along the access road to the site, restoration of a portion of the Riverfront Area in the northerly corner of the former gravel pit, and grading associated with incorporating stormwater management system at the site. EcoTec, Inc. has submitted a letter dated May 22, 2024 detailing these alterations, associated restoration and waiver request.

All structures and impervious surfaces associated with the project have been designed to be located outside the 50-foot no disturb buffer zone. The proposed alterations within the 50-foot no disturb buffer zone are to occur entirely within the existing disturbed area of the site and are separated from the surrounding wetland by an existing earthen berm. Additionally, the alterations will result in an improvement to the site and additional protections to the resource areas through the incorporation of stormwater management that is presently absent, the repair of plow damage along the access road, and the restoration of a degraded area in the northeasterly corner of the site.

As noted by EcoTec's waiver request, the improvements associated with the limited work within the 50' buffer zone will represent a positive effect with respect to wetland interests. We respectfully request the Commission allow the alterations to incorporate stormwater management, repair the plow damage, and undertakes restoration activities.

11/11A Consider adding a sign to not plow snow into wetland to reinforce the boulders. / The applicant should provide a detail or specifications for the sign. The specifics of the sign shall be coordinated with the Conservation Commission.

Should the limited waiver for work within the 50' no disturb buffer zone be granted, the applicant will undertake the restoration of the slope of the access road that has been damaged by plowing. Incorporated within this is the requested signage. Signage has been detailed on sheet C2.0 and will incorporate a metal post allowing the sign to be located a minimum of 4' above grade or at a height desired by the Commission. The applicant is willing to work with the Commission to allow the sign to be the size desired by the Commission and to be field located to be protected by boulders.

12/12A Please provide the drilling and installation procedure for the private well. / The Town code section 226-7 doesn't provide detailed information for the drilling and dewatering operations for the installation of the well. We defer to the Conservation Commission if more detail is required.

The proposed well is to be installed within the existing utilized portion of the site which is surrounded by an earthen berm. The earthen berm is approximately three (3) feet higher than the proposed well location. The existing berm will preclude products of erosion from reaching the wetlands. Additionally, an erosion control barrier will be located downgradient of the proposed well during installation. Should the Commission desire, the applicant will accept a condition that the well installation rig operate outside the 50-foot buffer zone and any dewatering operations are to be located outside the 50-foot buffer zone.

15/15A The well should be upgradient from runoff from the surrounding land unless adequately protected. It appears based on the grading it is located on a slope which allows runoff to run over it. Please clarify. Was moving the well to a ridgeline in the grading to minimize runoff considered? / It is understood that the well location could not be moved, but could additional grading be provided to direct runoff away from the well? We defer to the Board of Health for approval.

The proposed well location has been protected with boulders. As required by the Town of Littleton Well Construction Requirements §226-7, the space between the protective well casing and the wall of the drilled hole or surface of the casing shall be effectively sealed. Should the Board of Health require additional grading, we will inform the Commission of the need to do so. Any additional grading will occur within the location of presently proposed grading and within the limits of the disturbed portion of the site.

17/17A Proposed RFA Restoration Area is within the 50' No Disturbance Area. Please provide information on what will be done for restoration in this area. / We defer to the Conservation Commission if the restoration work within the 50' No Disturb area is acceptable.

EcoTec, Inc. has provided the requested specifications for the restoration area. The area will provide over 3,400 SF of restoration consisting of native plantings. This will result in an increase in the vegetative buffer at the site and an improvement over existing conditions.

18/18A Please show existing and proposed tree line so, it is clear where there will be tree clearing. Limit of tree clearing should be clear since there are rare and endangered species in the area. Please revise. / We defer to Natural Heritage & Endangered Species Program for acceptance of the tree removal.

It is our understanding that EcoTec, Inc. has submitted the details to NHESP concurrently with the submittal of the NOI. It is acknowledged that the project will need to comply with NHESP's determination.

28/28A The detention basin is being modeled in HydroCAD as an infiltration basin. The setbacks include being 50 feet from any slope greater than 15%, 50 feet from surface water of the commonwealth, and 100 foot from a private well. The side slopes down to the wetland appear to be over 15%, please confirm. Bennett's Brook is less than 50 feet from the basin. The top of the basin is within the 100 ft buffer of the private well. The basin appears to not meet the setback requirements of an infiltration basin. Please revise. / The applicant has not provided sufficient setbacks to meet the requirements of the Massachusetts SW Handbook. We defer to the Conservation Commission if this is acceptable.

The proposed basin is capturing runoff from the existing site entrance and mitigating it within the confines of the existing berm surrounding the existing disturbed area of the site. The existing berm is being utilized for a portion of the sidewall of the basin to minimize alterations. Presently, the site entrance lacks any stormwater controls and the incorporation of stormwater controls will be an improvement over existing conditions. The site is a redevelopment of a previously disturbed and degraded area. We respectfully request the Commission allow the improvements to allow for the mitigation of stormwater associated with the site entrance.

We trust this meets your needs at this time. If you have any questions or require any additional information, please do not hesitate to contact me.

Regards,

DILLIS & ROY
CIVIL DESIGN GROUP, INC.



Seth Donohoe
Vice President

cc: Brite Excavating (applicant)
EcoTec, Inc.