

March 30, 2021

Sudbury Conservation Department 275 Old Lancaster Road Sudbury, MA 01776 Attn: Lori Capone, Conservation Coordinator

Re: Marlboro Road Culvert Replacement NOI Response to Comments

Dear Ms. Capone:

Thank you for coordinating the review of the proposed culvert replacement on Marlboro Road in Sudbury. The following letter compiles responses to comments received from you via email on March 18, 2021. The comments received are provided below for your reference, and our response follows each comment in italics:

- There is no discussion on how the project meets the Wetlands Bylaw. Unaltered Buffer Zone
 (Adjacent Upland Resource Area) is a resource area under the Bylaw. Impacts thereto should be
 mitigated or explain how functions provided by AURA are not being impacted.
 - The Town of Sudbury Wetlands Administration Bylaw (Article XXII) and its associated Sudbury Wetlands Administration Bylaw Regulations (revised September 25, 2017) establishes jurisdictional Adjacent Upland Resource Areas (AURAs). The Bylaw defines AURAs as land within 100-feet of wetland resource areas, within 200-feet of top of bank, and with varying extent when adjacent to vernal pools, ponds <10,000 square feet in area, or isolated land subject to flooding. The proposed replacements of Marlboro Rd culvert include work within 100-feet of Bordering Vegetated Wetlands, considered an AURA under the Bylaw.

The project was designed to minimize the amount of disruption and alteration to the AURA within the project limit of work, and the work area is generally within in the portion of the AURA that is already altered. Temporary land disturbances caused by construction will be stabilized and restored to existing conditions. A native New England Conservation/Wildlife seed mix will be applied to the temporarily disturbed areas. The blend of species will provide a permanent cover of grasses, forbs, wildflowers, and legumes to control soil erosion and enhance wildlife habitat. The roadway above the crossing will be replaced in the same footprint as the existing roadway.

The Marlboro Road culvert is undersized and causes a scour hole at the outlet that is undermining the adjacent roadway. This crossing has been prioritized by the Town for replacement. A localized slope failure occurred in August of 2019 that resulted in emergency slope stabilization measures. Further deterioration of the roadway embankment could result in failure of the roadway section and compromising of the utilities within. The proposed alternative provides the least amount of temporary and permanent impact while substantially improving the stability and hydraulic capacity of the crossing. The new crossing will provide better wildlife passage with the natural bottom.

Revise delineation and impact calculations for Bordering Land Subject to Flooding based on defined FEMA elevations: 141.4 upstream, 135 downstream.



- The attached plans have been revised to indicate the revised delineation and impact calculations for Bordering Land Subject to Flooding, using the defined FEMA elevations. See Sheet C-102 for these revisions. This has reduced the area of impact to the BLSF by approximately 414 square feet.
- 3. Add erosion controls around upstream grading beyond the coffer dam.
 - o Sediment barrier has been added around the upstream grading beyond the coffer dam.
- 4. Is the riprap behind the upstream headwall needed or can this be vegetated?
 - Due to the slope of this area, we are recommending the small amount (approximately 146 SF) of riprap.
- 5. Add a construction detail for the geocell.
 - o A construction detail for the geocell has been added to plan sheet C-201.
- 6. Note where reinforced matting and erosion control matting is proposed.
 - We have removed the reference to reinforced matting, which we are not using. A note has been added indicating the area where the erosion control matting is to be applied on the north side of the culvert (where slopes are greater than 3:1).
- Remove "Contractor Option" from erosion control details. Plan/Order dictates erosion controls needed, which the contractor can request to modify later, but it should not be left to their own discretion.
 - We have removed "Contractor Option" from the erosion control details.
- 8. Note native seed mixes that should be used.
 - A native seed mix specification has been added to the notes and callouts on sheet C-102.
 Native wildflower see mix shall be New England Environmental Conservation/Wildlife mix, or similar. Native wetland see mix shall be New England Erosion Control/Restoration mix for detention basins and moist sites.

If you have any questions or require additional information, please do not hesitate to contact me at 207-558-3662 or email me at dstairs@woodardcurran.com.

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Sincerely,

WOODARD & CURRAN INC.

Darrin Stairs, PE Project Manager

Enclosures: Revised Drawings

Massachusetts Department of Environmental Protection

Bureau of Resource Protection - Wetlands

WPA Form 3 - Notice of Intent

Massachusetts Wetlands Protection Act M.G.L. c. 131, §40

Provided by MassDEP: MassDEP File #:

eDEP Transaction #:1262875 City/Town:SUDBURY

Size of Proposed Alteration Proposed Replacement (if any)

1. ▼ Yes ¬ No If yes, describe which limited project applies to this project:

310 CMR 10.53(3)(F). MAINTENANCE AND IMPROVEMENT OF AN EXISTING PUBLIC 2. Limited

Project ROADWAY.

Resource Area

8. Property recorded at the Registry of Deeds for:

a.County: **b.Certificate:** c.Book: d.Page: SOUTHERN MIDDLESEX N/A N/A

B. Buffer Zone & Resource Area Impacts (temporary & permanent)

1.Buffer Zone & Resource Area Impacts (temporary & permanent):

This is a Buffer Zone only project - Check if the project is located only in the Buffer Zone of a Bordering Vegetated Wetland, Inland Bank, or Coastal Resource Area.

2.Inland Resource Areas: (See 310 CMR 10.54 - 10.58, if not applicable, go to Section B.3. Coastal Resource Areas)

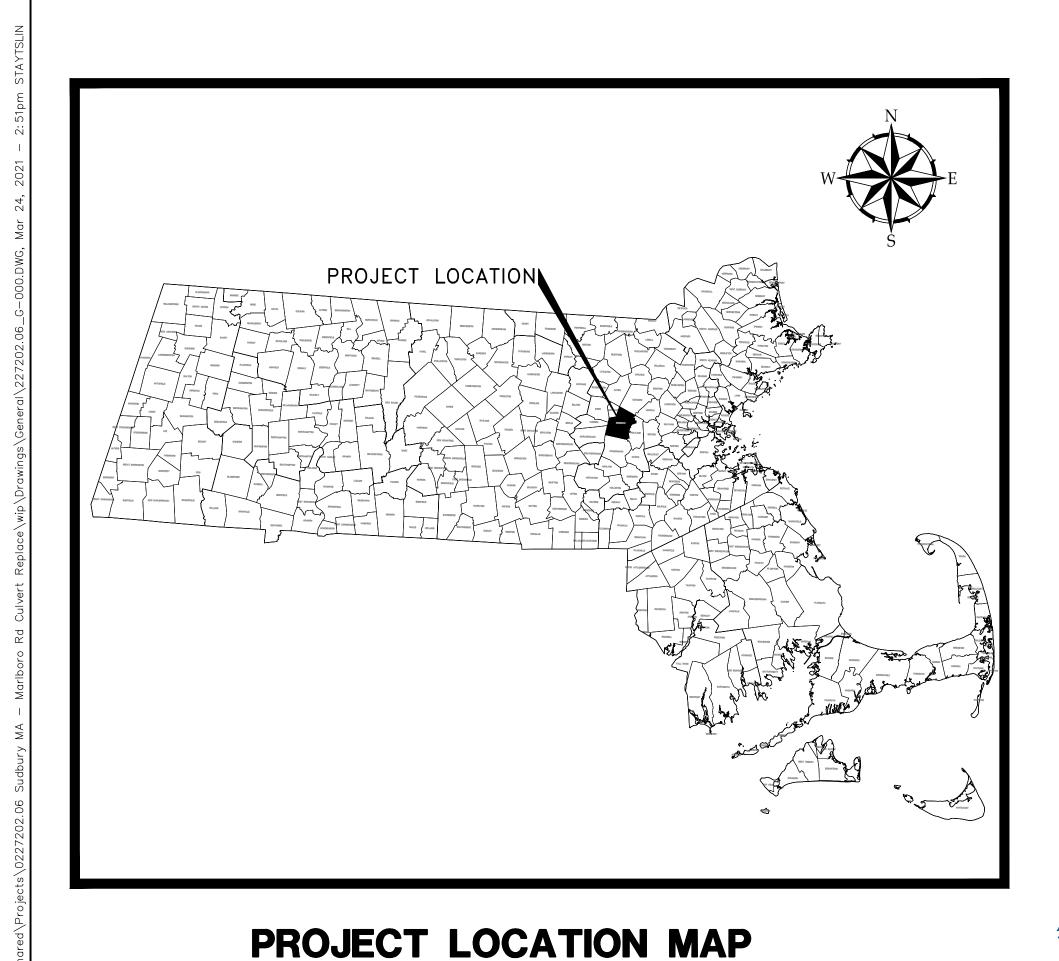
| | r | (<i>y</i>) | |
|--|--|---|--|
| a. ▽ Bank | 128 1. linear feet | 128 2. linear feet | |
| b. ▼ Bordering Vegetated Wetland | 346 1. square feet | 346 2. square feet | |
| c. ✓ Land under Waterbodies and Waterways | 560 1. Square feet | 5602. square feet | |
| | 0 3. cubic yards dredged | | |
| d. ■ Bordering Land Subject to Flooding | 1,9671. square feet03. cubic feet of flood storage lost | 1,9672. square feet4. cubic feet replaced | |
| e. ☐ Isolated Land Subject to Flooding | 1. square feet | 4. cubic feet replaced | |
| | 2. cubic feet of flood storage lost | 3. cubic feet replaced | |
| f. | Pantry Brook 1. Name of Waterway (if any) | | |
| 2. Width of Riverfront Area (check one) | | ☐ 25 ft Designated Densely Developed Areas only ☐ 100 ft New agricultural projects only ☐ 200 ft All other projects | |
| 3. Total area of Riverfront Area on the site of the proposed project | | 8000 square feet | |
| 4. Proposed Alteration of the Riverfront Area: | | | |

800 800

a. total square feet b. square feet within 100 ft. c. square feet between 100 ft.

and 200 ft.

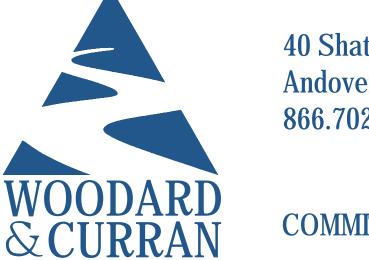
TOWN OF SUDBURY, MA MARLBORO ROAD CULVERT REPLACEMENT



PROJECT NO. 227202.06

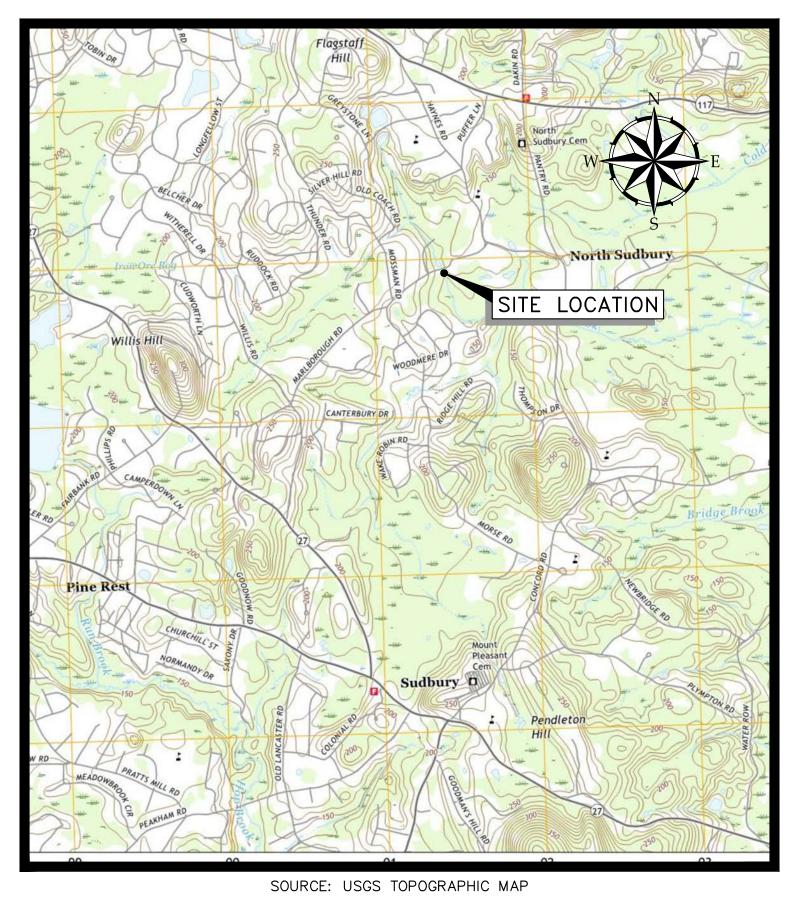
MARCH 2021

NOTICE OF INTENT NOT FOR CONSTRUCTION



40 Shattuck Road, Suite 110 Andover, Massachusetts 01810 866.702.6371 | www.woodardcurran.com

COMMITMENT & INTEGRITY DRIVE RESULTS



SITE LOCATION MAP

