

October 24, 2022

Mr. Adam L. Duchesneau, AICP
Director Planning and Community Development
Town of Sudbury
278 Old Sudbury Road
Sudbury, Massachusetts 01776

**Re: Peer Review of Stormwater Management Permit Application
Nobscot Scout Reservation Trail Improvement Project
1 Nobscot Road, Sudbury, MA**

Dear Mr. Duchesneau and Board Members:

Howard Stein Hudson (HSH) has reviewed the Horsley Witten Group comments on behalf of the Town of Sudbury dated October 11, 2022 and offers the following responses:

Sheet 1 of 21: Cover Sheet (no comments)

Sheet 2 of 21: Key Plan (no comments)

Sheet 3 of 21: Legion Cabin and Gen John Nixon Trail – Station 112+00 to 118+00

Comment 1: *Applicant proposed to remove 12 inches of soil build up for 20 feet on north, south and west side of Legion Cabin. Applicant should grade newly disturbed area away from building.*

Response: **Additional spot shots have been added surrounding the Legion Cabin to aid in the re-grading of this area and promote stormwater runoff away from the building.**

Comment 2: *HW understands basement is wet. Drip edge proposed for roof runoff, if feasible consider adding perforated pipe to pull roof runoff further away from building. Where grass is removed replace with mulch to the extent feasible.*

Response: **A perforated 4-inch PVC corrugated pipe has been included within the drip edge. The perforated pipe will daylight beyond the east corner of the Legion Cabin. Where grass is removed, the area will be stabilized with mulch.**



Comment 3: *Area noted to remove rocks and regraded adjacent to Station 114+50 may not be necessary if for aesthetics only. Once remove vegetation in this area invasives could become a problem.*

Response: **This area in front of the Legion Cabin has been removed from the project.**

Comment 4: *Review use of firewood in Conservation Restriction, may be okay to use down trees but this should not be considered an automatic approval.*

Response: **Only approved trees for removal or downed trees are used on the property for firewood.**

Comment 5: *Culvert northeast of cabin at Station 112+00 should be cleaned out when working in this area. Proposed fill should not extend into wetlands but remain on path.*

Response: **A callout has been added to the plans to facilitate the cleaning of this existing culvert during construction. The low areas to be filled adjacent to the wetland crossing are within the path and silt fence and compost filter tubing is shown to protect this area and ensure that the fill does not encroach into the wetland.**

Comment 6: *Rocks at high point of Gen John Nixon Trail around Station 115+50 have been removed causing some erosion. Slope on north side of trail could become unstable. Consider means to support slope during Phase 1 improvements. This may require heavy equipment and not be feasible for volunteers to do by hand.*

Response: **The plans have been updated to address the areas that were distributed along the uphill side of the Nixon Trail. One area will be addressed by installing a stone wall utilizing the existing boulders and large rocks that were removed. Other areas will be established using smaller rocks as fill, loam and hydroseeded with straw matting pinned in position will be added to these areas after seeding to protect from washout.**

Sheet 4 of 21: White Ridge Trail – Station 119+00 to 125+00

Comment 7: *Work to be conducted in Phase 1 of trail improvements. Consider adding 3 to 4 water bars between Stations 121+25 and 123+50 to direct runoff towards the east.*

Response: **Additional water bars have been added to the trail in this area.**



Comment 8: *Concern with invasives within swales after land disturbance. Hydroseed immediately and monitor.*

Response: **The intent is to hydroseed immediately as part of the stabilization plan which includes biodegradable straw matting pinned in place immediately after seeding to prevent washout. All graded areas will be monitored for invasives.**

Comment 9: *During site walk discussed closing trail adjacent to wetland series M1-M12 temporarily while addressing erosion issues at this intersection.*

Response: **Additional silt fencing has been installed to prevent sediment from entering that wetland. This additional silt fence has been added to the plans. The sediment within the wetland area will be removed by hand.**

Comment 10: *Level spreader may be needed around Station 124+25 to slow flow and reduce erosion.*

Response: **A level spreader has been added at this location to slow stormwater runoff.**

Comment 11: *Crushed stone bed may be needed between Station 124+50 and 125+00.*

Response: **Additional gravel/crushed stone has been shown within the trail in this area. The area calc table for this sheet reflects the additional temporary upland disturbance.**

Comment 12: *Applicant to review all areas of land disturbance. Areas where grades are changing, and swales created in uplands should be considered a permanent impact and not temporary.*

Response: **Work on the trails within the existing limits are considered temporary impacts. The clearing and grading associated with swales construction is considered permanent and associated tables on the plans have been updated.**

Sheet 5 of 21: Monson Trail – Station 400+00 to 407+00

Comment 13: *HW recommends installing water bars along trail with professional oversight.*

Response: **Additional water bars have been added to the trail in this area.**

Comment 14: *Crushed stone to be super elevated on southern edge.*



Response: A note has been provided to ensure that the cross slope of the trail has a minimum pitch of 1.5% from south to north across this trail section.

Comment 15: *Sediment in path around Station 403+75 should be removed and replaced with stone. Document where sediment that will be removed will be placed temporarily and permanently.*

Response: A callout has been added to the plans to remove the sediment. Sediment removed from around the cabin will be stockpiled at the maintenance facility until its permanent use is determined. Any stockpiled areas will be located outside of wetlands and buffer zones.

Comment 16: *Washout visible around Station 404+50 should be removed by hand.*

Response: This sediment will be removed.

Comment 17: *Crushed stone should be extended to approximately Station 404+60 at larger boulder.*

Response: Additional gravel/crushed stone has been shown between and beyond the areas previously shown to extend continuously from STA 400+17 to STA 404+57. The area calculation table for this sheet reflects the additional temporary upland disturbance.

Sheet 6 of 21: Monson Trail – Station 408+00 to 418+00

Comment 18: *Recommend adding water bars between Station 411+00 and 412+00.*

Response: An additional water bar has been added at STA 411+50.

Sheet 7 of 21: Ellis Land Trail in Framingham (no comments)

Sheet 8 of 21: Legion Trail – Station 1+00 to 8+00

Comment 19: *Placement of 6-foot-long concrete footings for wooden platform at Station 1+00 to be done by hand. Other footing types instead of heavy concrete footings may be considered.*

Response: As the footings will be lying within wet areas for a significant length of time the most practical material to use is concrete. All work in this area will be completed by hand.



Comment 20: *Applicant to review all areas of land disturbance. Areas within wetlands receiving stone should be considered a permanent impact and not temporary.*

Response: **Work on the existing trails is considered temporary in most locations, except where footings and structures are being installed. Areas of the existing, disturbed trails that are receiving stone are also considered temporary. Currently, these areas consist of compacted gravel and are devoid of vegetation. Where stone is being installed, vegetation will not be altered in the wetland and the substrate, albeit modified, will be restored to existing grade upon completion. The stone will serve to prevent sedimentation into the adjacent undisturbed wetlands, and also serve to prevent pedestrian foot traffic from widening the trails and further altering the wetlands. No wetland loss is proposed at these locations and the impacts are therefore considered temporary in nature and would not require replication. Impact tables have been revised to reflect this as noted in the Lucas Environmental, LLC Notice of Intent Supplement #1 Letter, dated October 24, 2022.**

Comment 21: *Erosion controls within wetlands should not include trenching of silt fence. Okay to weigh down with silt sock. Measures to be taken to protect turtles during construction.*

Response: **Silt fence details has been revised to eliminate trenching previously shown to be replaced by compost filter tubing staked in place where necessary. A turtle barrier entrance detail has been added to the Details sheet.**

Comment: *Applicant can get vehicles to largest bridge replacement between Station 7+00 and 8+00. Plan to widen this bridge.*

Response: **The intent is to widen this bridge to allow for an ATV and the lawn mower to cross the bridge. It will not be large enough to allow for other vehicles such as a pick-up truck to cross.**

Sheet 9 of 21: Muskie Trail – Station 9+00 to 15+00

Comment: *HW believes trail mislabeled on plan and should be Legion Trail not Muskie Trail.*

Response: **Trail label has been revised to indicate Legion Trail.**



- Comment:** *Applicant to review all areas of land disturbance. Areas within wetlands receiving stone should be considered a permanent impact and not temporary. Culvert crossing is permanent impact.*
- Response:** **Work on the existing trails is considered temporary in most locations, except where footings and structures (i.e., culverts) are being installed. Areas of the existing, disturbed trails that are receiving stone are also considered temporary. Currently, these areas consist of compacted gravel and are devoid of vegetation. Where stone is being installed, vegetation will not be altered in the wetland and the substrate, albeit modified, will be restored to existing grade upon completion. The stone will serve to prevent sedimentation into the adjacent undisturbed wetlands, and also serve to prevent pedestrian foot traffic from widening the trails and further altering the wetlands. No wetland loss is proposed at these locations and the impacts are therefore considered temporary in nature and would not require replication. Impact tables have been revised to reflect this as noted in the Lucas Environmental, LLC Notice of Intent Supplement #1 Letter, dated October 24, 2022.**
- Comment:** *Invasive species in this area are a concern, including poison ivy, specifically north side of trail for 25 feet beyond proposed grading, south side is also a problem but not as severe. Invasive management plan should be reviewed with Conservation Commission. Replant disturbed area with shrubs and spray seed mix. Weed Warrior program was discussed. Applicant should explain how it intends to restore the temporary impacts to the wetlands in this area.*
- Response:** **Temporary impact areas will be loamed and hydroseeded with a wetland seed mix. All upland areas will be hydroseeded. All disturbed areas and approximately 5ft past the limit of work will be monitored for invasives by Lucas Environmental, LLC. The applicant is very interested in the Weed Warrier program and would like to explore that idea with the goal of having some of their volunteers trained to identify and remove invasive species through the trail system.**
- Comment:** *There is a trail to the Peabody Camp site. Questions were raised during site walk on how this trail is accessed by the campers with special needs.*



- Response:** The Nobscot Trail systems is not ADA accessible. Groups with members who have special needs coordinate access with the Mayflower Council's Camping & Program Director.
- Comment:** *Work around latrine includes stone trench. Should be placed at roof drip line and not adjacent to building.*
- Response:** Existing building footprints and roof overhang limits have been revised per measurements taken in the field. Stone drip edges are shown at the front and back of the latrine at both sides of the drip line.
- Comment:** *Work around Webelos Woods Cabin 5 includes excavating large rocks. Recommend leaving rocks as it appears difficult to remove them by hand and the need to remove is not obvious. Recommend adding a stone trench at drip line west side of cabin.*
- Response:** **Stone removal callout has been eliminated and a stone drip edge has been added along the west side of the cabin.**

Sheet 10 of 21: Little Sachem Bridge, Legion Trail – Station 16+00 to 17+00

- Comment:** *Bridge replacement to be included in Phase 1 improvements. Bridge will be built onsite.*
- Response:** **The Little and Big Sachem Bridges are to be replaced in Phase III.**
- Comment:** *Concrete footings may be difficult to carry to this location. Applicant may want to consider helical piles.*
- Response:** Helical piles were considered; however, given the soils types, depth required for the piles, and specialized equipment required to drive the piles it was determined not to be the optimal method of construction.
- Comment:** *When calculating disturbance consider footings permanent disturbance while bridge is temporary disturbance.*
- Response:** **Bridge square footage has been added to impact tables on appropriate sheets as a temporary impact and footing as permanent.**
- Comment:** *Keep utility pole acting as headwall.*



Response: The utility pole will need to be removed to install the new bridge footing, and joints.

Comment: *Extend bog bridge or add stone for another 8 feet around station 16+75.*

Response: An additional 8-foot section of wood platform has been added to the plans and bridge detail.

Sheet 11-13 of 21: Jethro Trail in Framingham (no comments)

Sheet 14 of 21: Ellis Land Trail in Framingham (no comments)

Sheet 15 of 21: Thirty Rod Trail – Station 100+00 to 110+00 (no comments)

Sheet 16-18 of 21: Gen John Nixon Trail – Station 200+00 to 226+00

Comment: *Applicant to review all areas of land disturbance. Areas within wetlands receiving stone should be considered a permanent impact and not temporary.*

Response: Work on the existing trails is considered temporary in most locations, except where footings and structures are being installed. Areas of the existing, disturbed trails that are receiving stone are also considered temporary. Currently, these areas consist of compacted gravel and are devoid of vegetation. Where stone is being installed, vegetation will not be altered in the wetland and the substrate, albeit modified, will be restored to existing grade upon completion. The stone will serve to prevent sedimentation into the adjacent undisturbed wetlands, and also serve to prevent pedestrian foot traffic from widening the trails and further altering the wetlands. No wetland loss is proposed at these locations and the impacts are therefore considered temporary in nature and would not require replication. Impact tables have been revised to reflect this as noted in the Lucas Environmental, LLC Notice of Intent Supplement #1 Letter, dated October 24, 2022.

Sheet 19 of 21: Ghost Trail and NIPMUC Trail (no comments)

Sheet 20 of 21: NIPMUC Trail – Station 314+00 to 319+00 and Belden Bridge

Comment: *Applicant intends to remove utility pole and fill void left by pole with precast concrete footing.*



Response: **Correct, all proposed bridges specify precast concrete footings.**

Comment: *Area that appears to be used by dogs to access stream should be planted with native vegetation that will discourage access. Within or adjacent to proposed wetland mitigation area.*

Response: **Planted vegetation will not provide a barrier to prevent dogs from entering the stream. All dogs are to be leashed within the Nobsco Trail Reservation. Applicant suggests placing a new sign to alert walkers to leashing their dog and to keep the dogs out of the stream.**

Sheet 21 of 21: Details

Comment: *Stone proposed to be placed on paths should be $\frac{3}{4}$ inch to $1\frac{1}{2}$ inch crushed stone.*

Response: **Trail Section Detail has been revised to specify gravel/crushed stone size to be placed throughout the trail system.**

Comment: *Stone to be used in check dams should be a minimum of 3 inches.*

Response: **Check Dam Detail has been revised to specify 3 inches as the minimum diameter for the stone to be used.**

Comment: *On Water Bar Section detail add depth of lip.*

Response: **Water Bar Section Detail has been revised to specify a 2-inch lip for the exposed upstream facing portion of the log or timber being used.**

Comment: *Add silt fence detail with weighted silt sock.*

Response: **Silt Fence Detail has been revised to show a weighted compost filter tube staked in place to hold down the bottom the filter fabric rather than the stone filled trench that was previously shown.**

Please contact me at (617) 348-3310 or jdowning@hshassoc.com if you have any additional questions or comments.

Sincerely,



James Downing
Project Manager

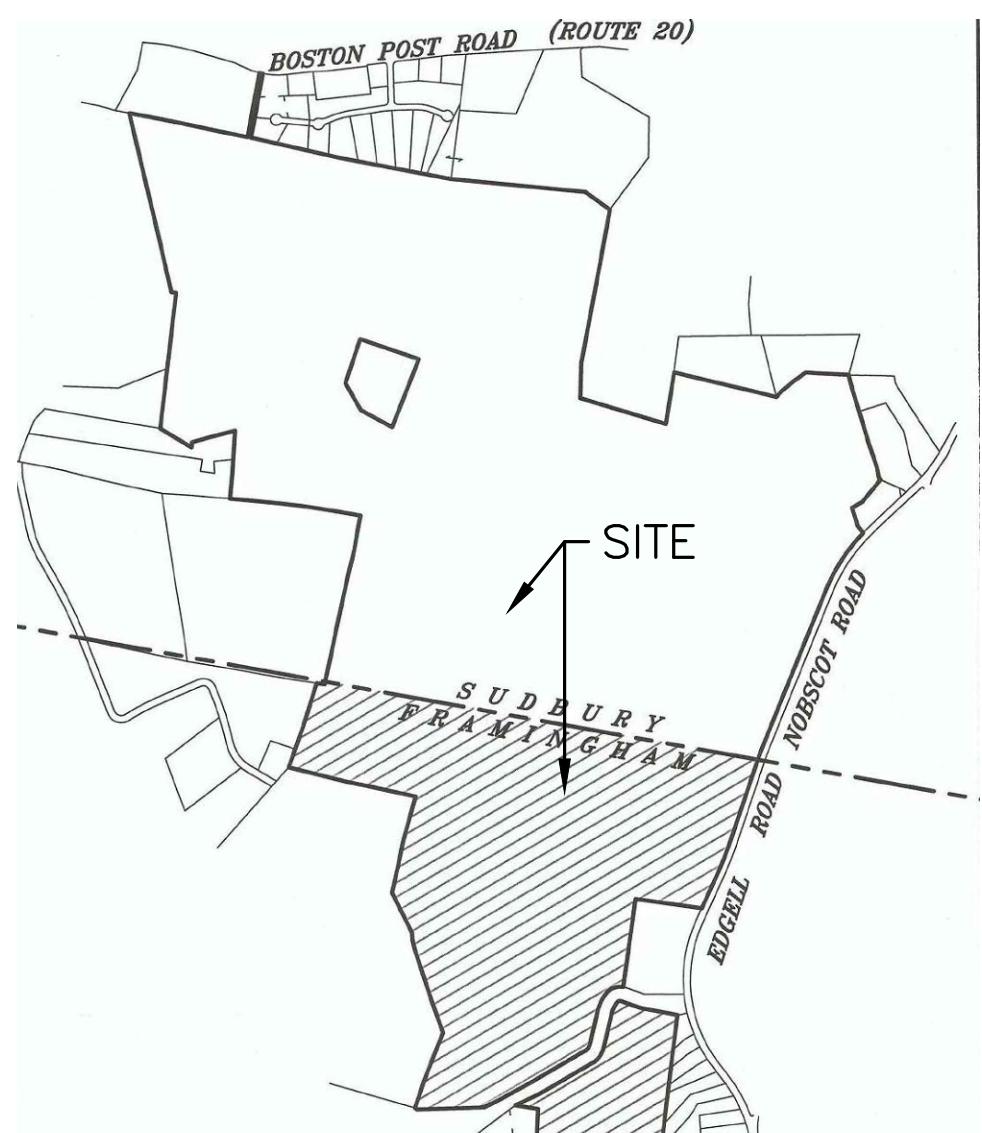
cc: MassDEP Division of Wetlands & Waterways, Northeast Regional Office
Massachusetts Natural Heritage & Endangered Species Program (electronic copy)
Lucas Environmental, LLC (electronic copy)
Property Owner &Applicant – Mayflower Council, Boy Scouts of America (electronic copy)



HOWARD STEIN HUDSON
11 Beacon Street, Suite 1010
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SITE PLAN FOR NOBSCOT SCOUT RESERVATION TRAIL PROJECT SUDBURY AND FRAMINGHAM, MA.

- GENERAL NOTES:**
- EXISTING PROPERTY LINE AND UTILITY INFORMATION SHOWN IS BASED ON AN EXISTING SURVEY CONDUCTED BY FELDMAN LAND SURVEYORS REVISED THROUGH 04-13-2022.
 - WETLAND DELINEATION COMPLETED BY LUCAS ENVIRONMENTAL, LLC UPDATED THROUGH MARCH 17, 2022.
 - "WF" SERIES REFER TO BORDERING VEGETATED WETLANDS, UNLESS OTHERWISE NOTED OR LABELED.
 - "BF" SERIES REFER TO INLAND BANK, UNLESS OTHERWISE NOTED OR LABELED.
 - THE 100-FOOT BUFFER ZONE IN THE TOWN OF SUDBURY IS DESIGNATED AS THE ADJACENT UPLAND RESOURCE AREA.
 - WF-J CONTAINS A CERTIFIED VERNAL POOL.
 - THE LIMIT OF WORK AREA IS LOCATED WITHIN ESTIMATED HABITAT FOR RARE WILDLIFE (EH 622) AND PRIORITY HABITAT FOR RARE SPECIES (PH 669).
 - THE ACCURACY AND COMPLETENESS OF THE UNDERGROUND UTILITIES AS SHOWN ON THE PLANS ARE NOT GUARANTEED. IT SHALL BE THE CONTRACTOR'S RESPONSIBILITY TO DETERMINE THE EXACT LOCATION, SIZE, TYPE, ETC. OF ALL UNDERGROUND UTILITIES THAT MAY BE AFFECTED BY THE WORK. AT LEAST 72 HOURS BEFORE EXCAVATION, THE CONTRACTOR SHALL BE REQUIRED TO CONTACT DIGSAFE AT 1-888-344-7233.
 - THE CONTRACTOR SHALL FIELD VERIFY CONDITIONS AND DIMENSIONS PRIOR TO CONSTRUCTION AND REPORT ANY DISCREPANCIES TO THE ENGINEER.
 - WHERE AN EXISTING UTILITY IS FOUND TO CONFLICT WITH THE PROPOSED WORK, THE LOCATION, ELEVATION, AND SIZE OF THE UTILITY SHALL BE APPROPRIATELY DETERMINED WITHOUT DELAY BY THE CONTRACTOR AND THE INFORMATION FURNISHED TO THE ENGINEER FOR RESOLUTION.
 - ALL UTILITY COMPANIES, PUBLIC AND PRIVATE, MUST BE NOTIFIED, INCLUDING THOSE IN CONTROL OF UTILITIES NOT SHOWN ON THIS PLAN, PRIOR TO EXCAVATING, BLASTING, INSTALLING, BACKFILLING, GRADING, PAVEMENT RESTORATION OR REPAVING.
 - THE CONTRACTOR SHALL MAINTAIN ALL EXISTING UTILITIES EXCEPT THOSE NOTED TO BE ABANDONED, REMOVED AND DISPOSED.
 - THE CONTRACTOR SHALL DISPOSE OF ALL WASTE MATERIAL IN ACCORDANCE WITH ALL FEDERAL, STATE, AND LOCAL REQUIREMENTS AT HIS/HER OWN EXPENSE, OUTSIDE OF THE PROJECT LIMITS.
 - THE SILT FENCE WILL BE INSTALLED AS CONSTRUCTION PROGRESSES IN AREAS SHOWN ON THE PLANS. IT WILL NOT BE INSTALLED SIMULTANEOUSLY THROUGHOUT THE SITE.
 - THE SILT FENCE IS TO BE USED AS THE TURTLE PROTECTION BARRIER IN ADDITION TO USE AS AN EROSION CONTROL DEVICE.
 - CONTRACTOR SHALL INSTALL A PLYWOOD CONSTRUCTION ACCESS BARRIER FOR TURTLE PROTECTION. THE BARRIER SHALL BE REMOVED AND REPLACED DAILY OR WHEN ACCESS IS NECESSARY.
 - GIS TOPOGRAPHIC INFORMATION PROVIDED FOR WOODED AREAS TO SUPPLEMENT THE SURVEY PROVIDED BY FELDMAN LAND SURVEYORS.



**LOCUS MAP
NOT TO SCALE**

SHEET INDEX	
SHEET 1	COVER SHEET
SHEET 2	PARTIAL EXISTING CONDITIONS PLAN
SHEET 3	KEY PLAN
SHEET 4-21	CONSTRUCTION PLANS
SHEET 22	DETAIL SHEET

OWNER

BOY SCOUTS OF AMERICA
MAYFLOWER COUNCIL
83 CEDAR STREET
MILFORD, MA 01757

FRAMINGHAM ASSESSORS INFORMATION

ASSESSORS MAP 008 BLOCK 01 LOT 2517
ASSESSORS MAP 008 BLOCK 11 LOT 7059
ASSESSORS MAP 015 BLOCK 19 LOT 6802

SUDBURY ASSESSORS INFORMATION

ASSESSORS MAP L BLOCK 05 LOT 0001
ASSESSORS MAP L BLOCK 05 LOT 0003
ASSESSORS MAP L BLOCK 05 LOT 0004
ASSESSORS MAP L BLOCK 05 LOT 0005
ASSESSORS MAP L BLOCK 05 LOT 0007
ASSESSORS MAP L BLOCK 05 LOT 0200
ASSESSORS MAP L BLOCK 06 LOT 0009

REFERENCES

1. EXISTING CONDITIONS SURVEY BY FELDMAN LAND SURVEYORS.

**NOBSCOT SCOUT
RESERVATION TRAIL
PROJECT
FRAMINGHAM AND SUDBURY, MA
WORCESTER COUNTY**

REVISIONS:			
NO	BY	DATE	DESCRIPTION

**NOBSCOT SCOUT
RESERVATION TRAIL
PROJECT
1 NOBSCOT ROAD
SUDBURY MA 01776**

**NOTICE OF INTENT
PERMIT SET**

**COVER
SHEET**

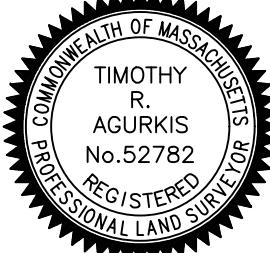
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PROJECT NUMBER:	16033.02
DESIGNED BY:	JBC
DRAWN BY:	JBC
CHECKED BY:	REL



1



I CERTIFY THAT THIS PLAN IS BASED ON AN ACTUAL FIELD SURVEY.



10/21/22
DATE

TIMOTHY R. AGURKIS, PLS (MA# 52782)
TRA@FELDMANGEOT.COM

PARTIAL EXISTING CONDITIONS PLAN
NOBSCOT RESERVATION

**SUDBURY &
FRAMINGHAM, MASS.**

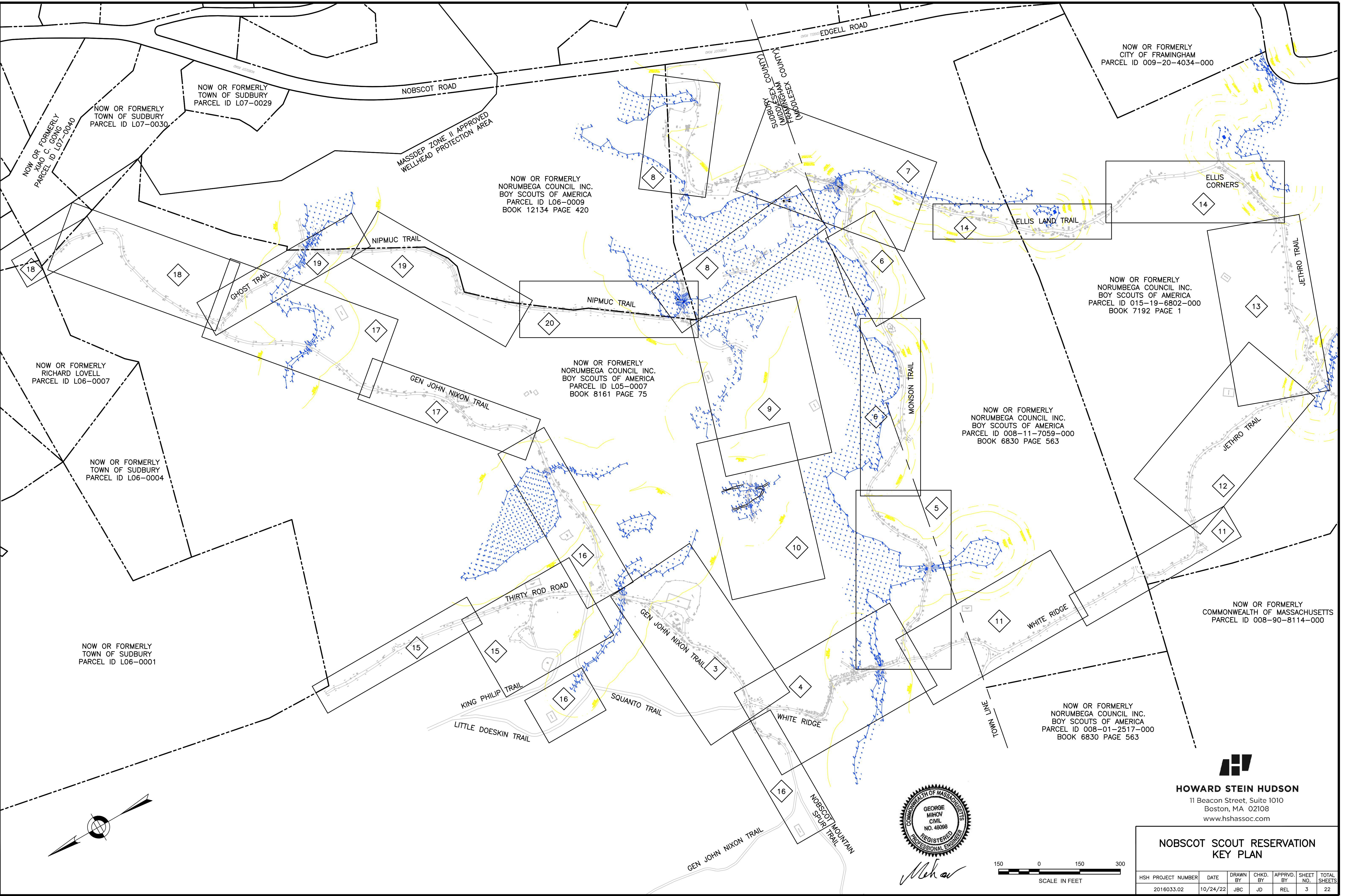
APRIL 5, 2022
PHONE: (617)357-9740
www.feldmangeospatial.com

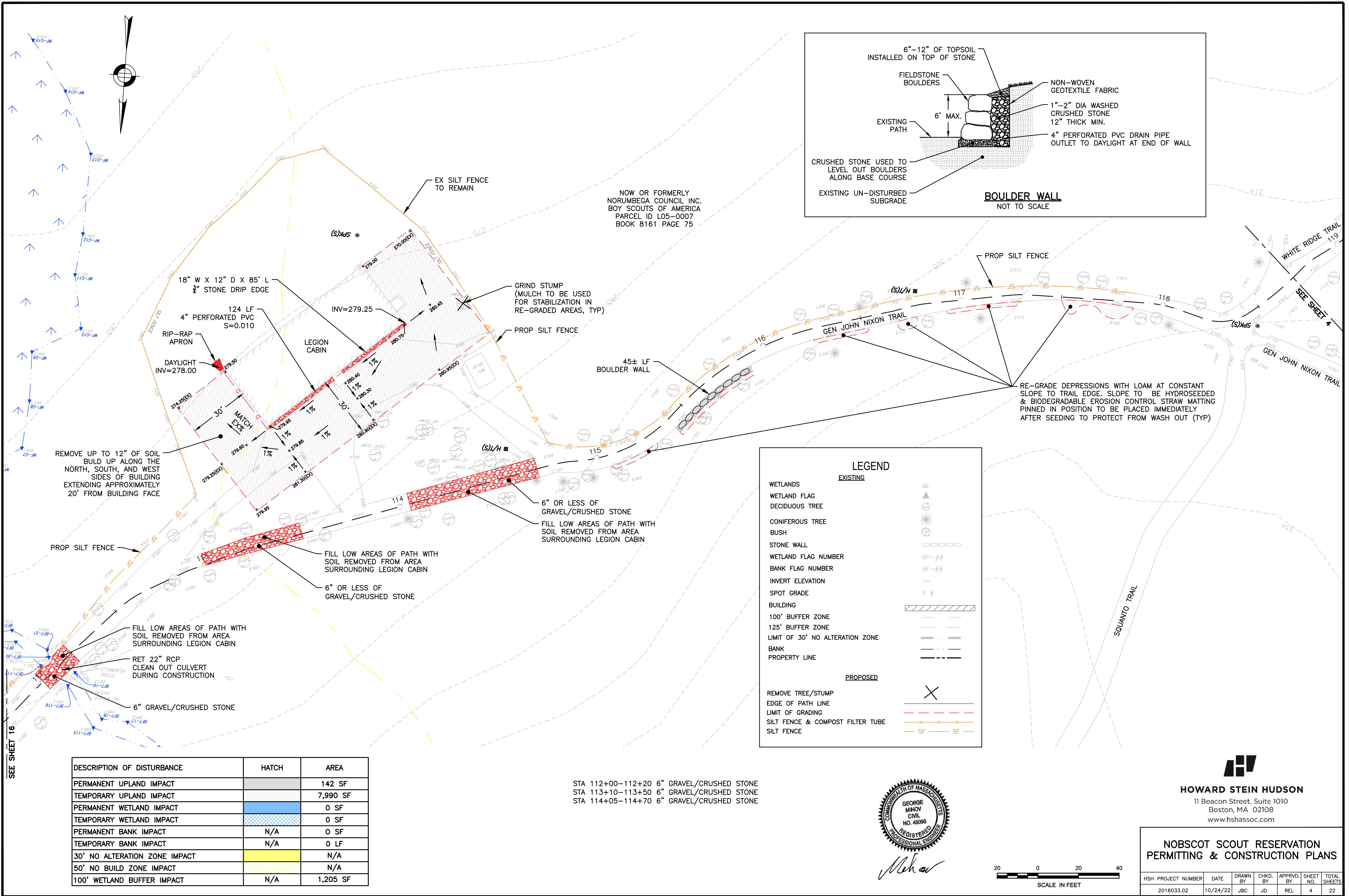
FELDMAN
GEOSPATIAL

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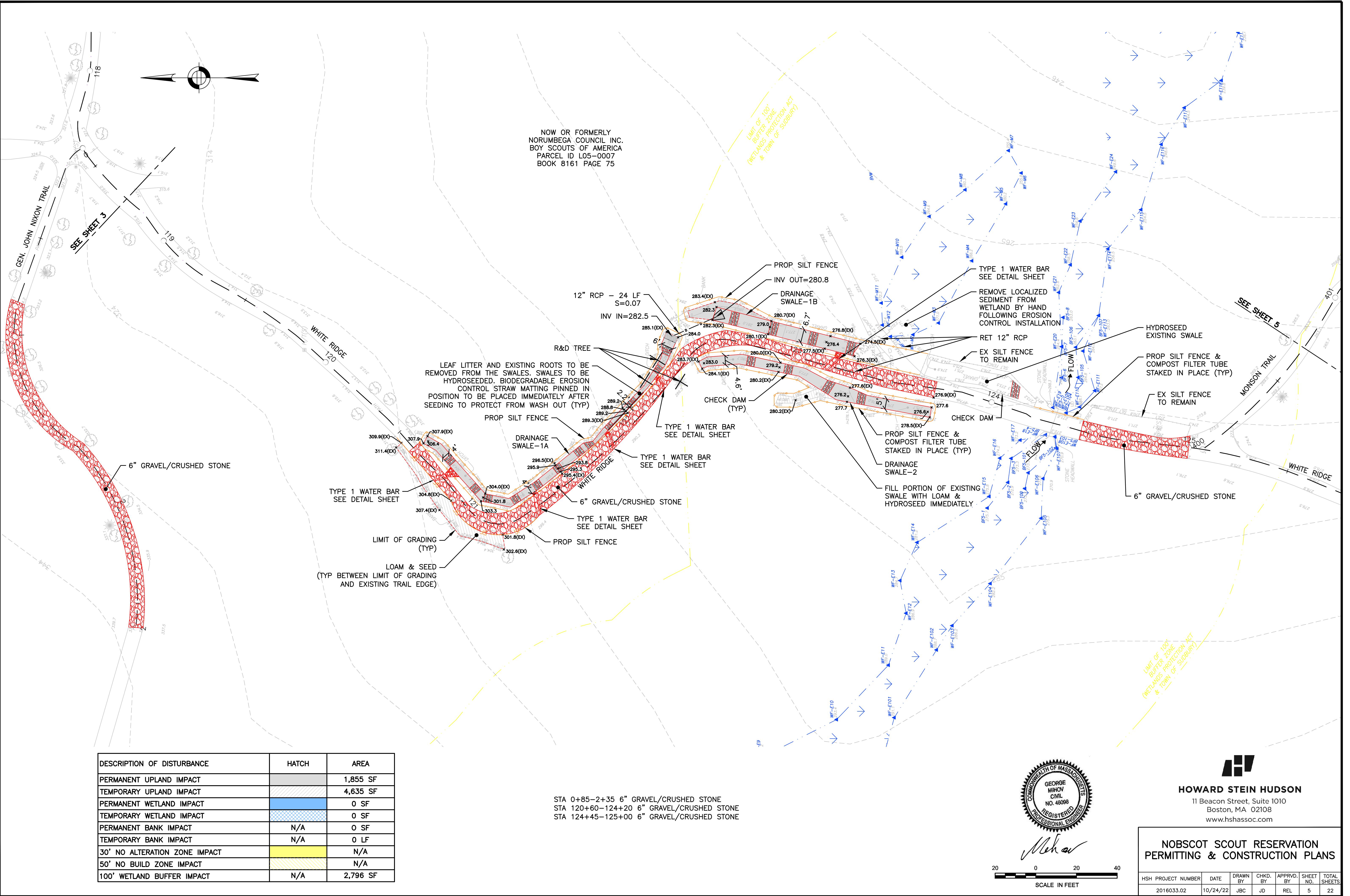
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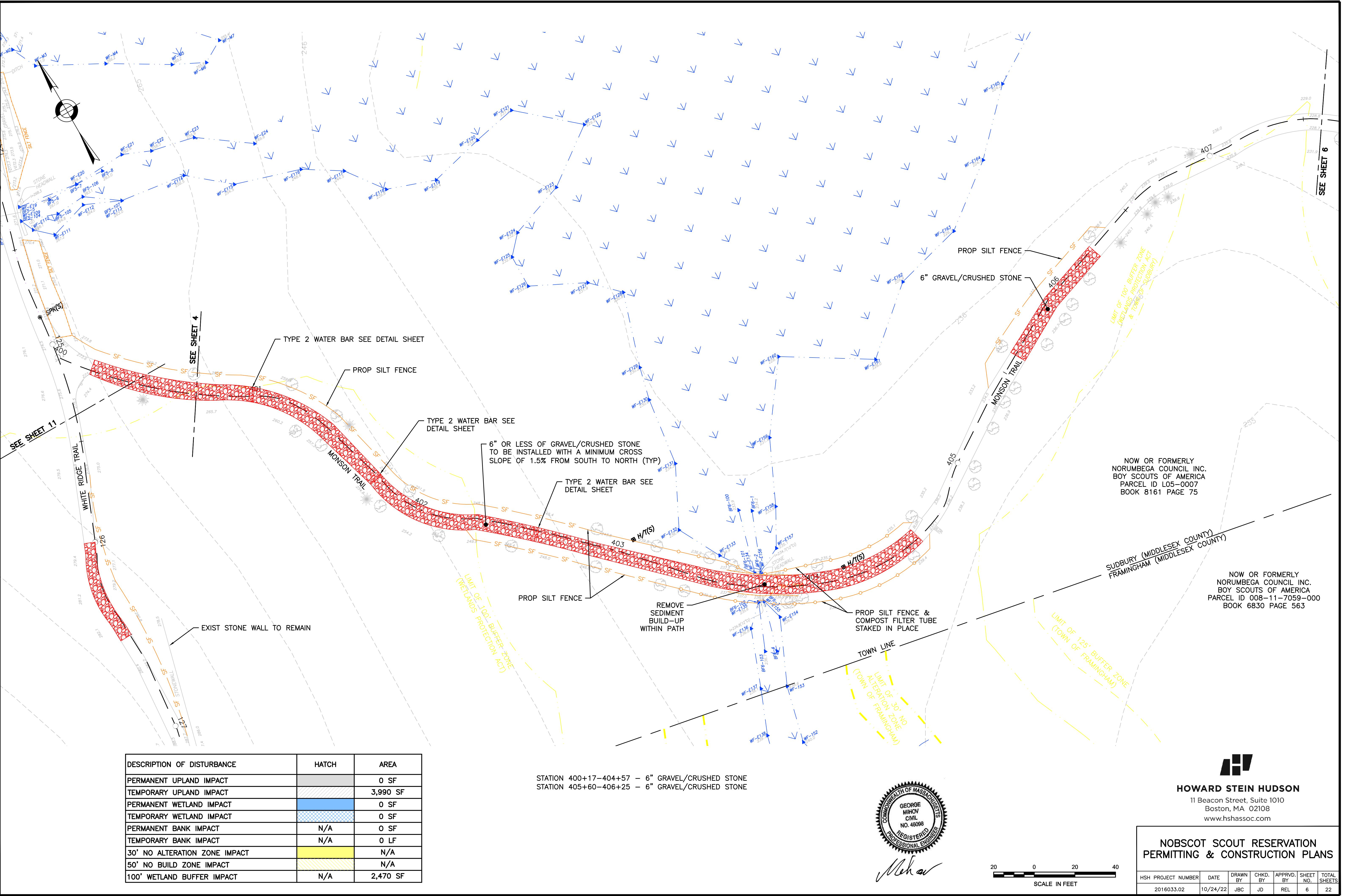
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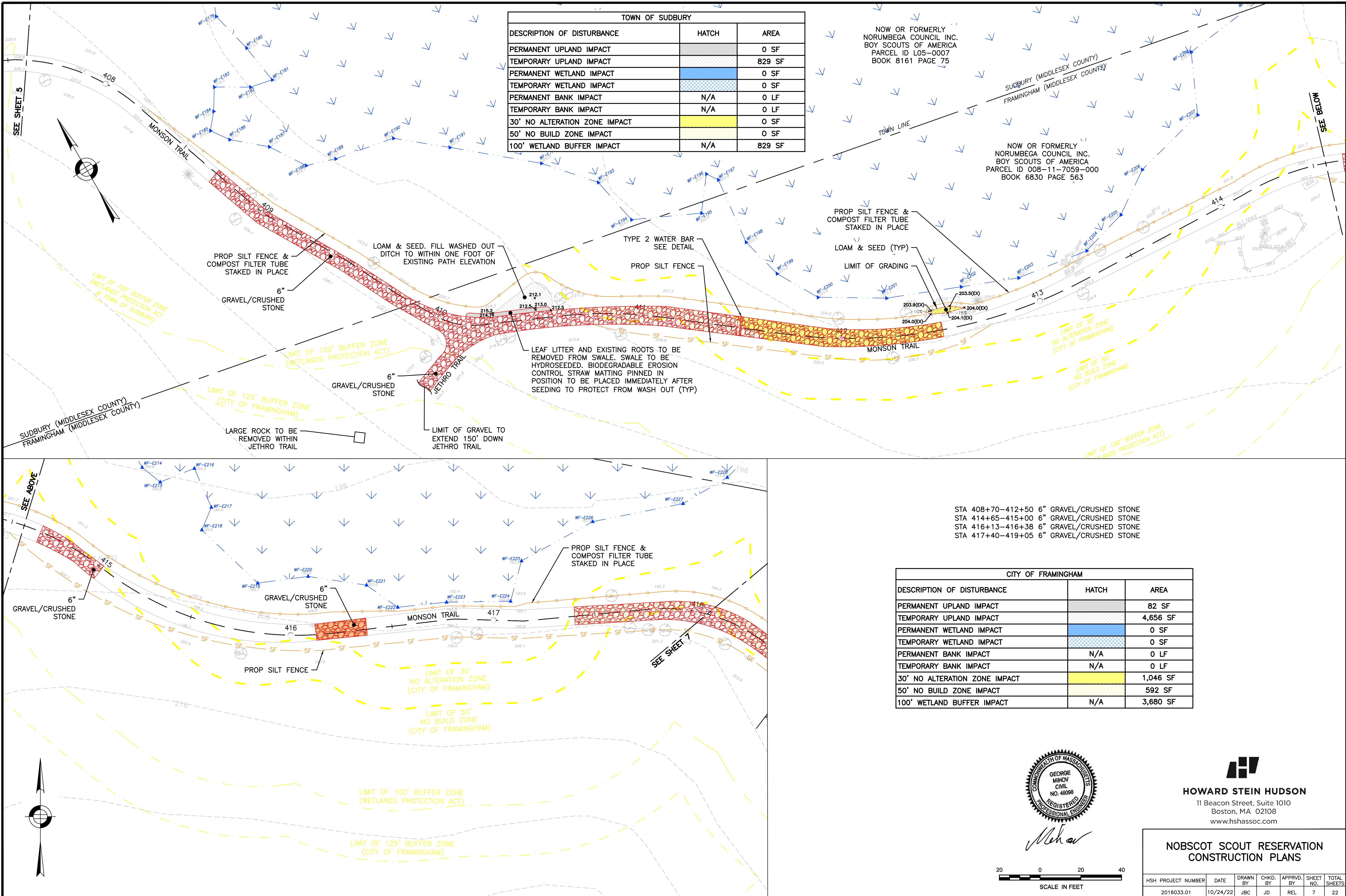


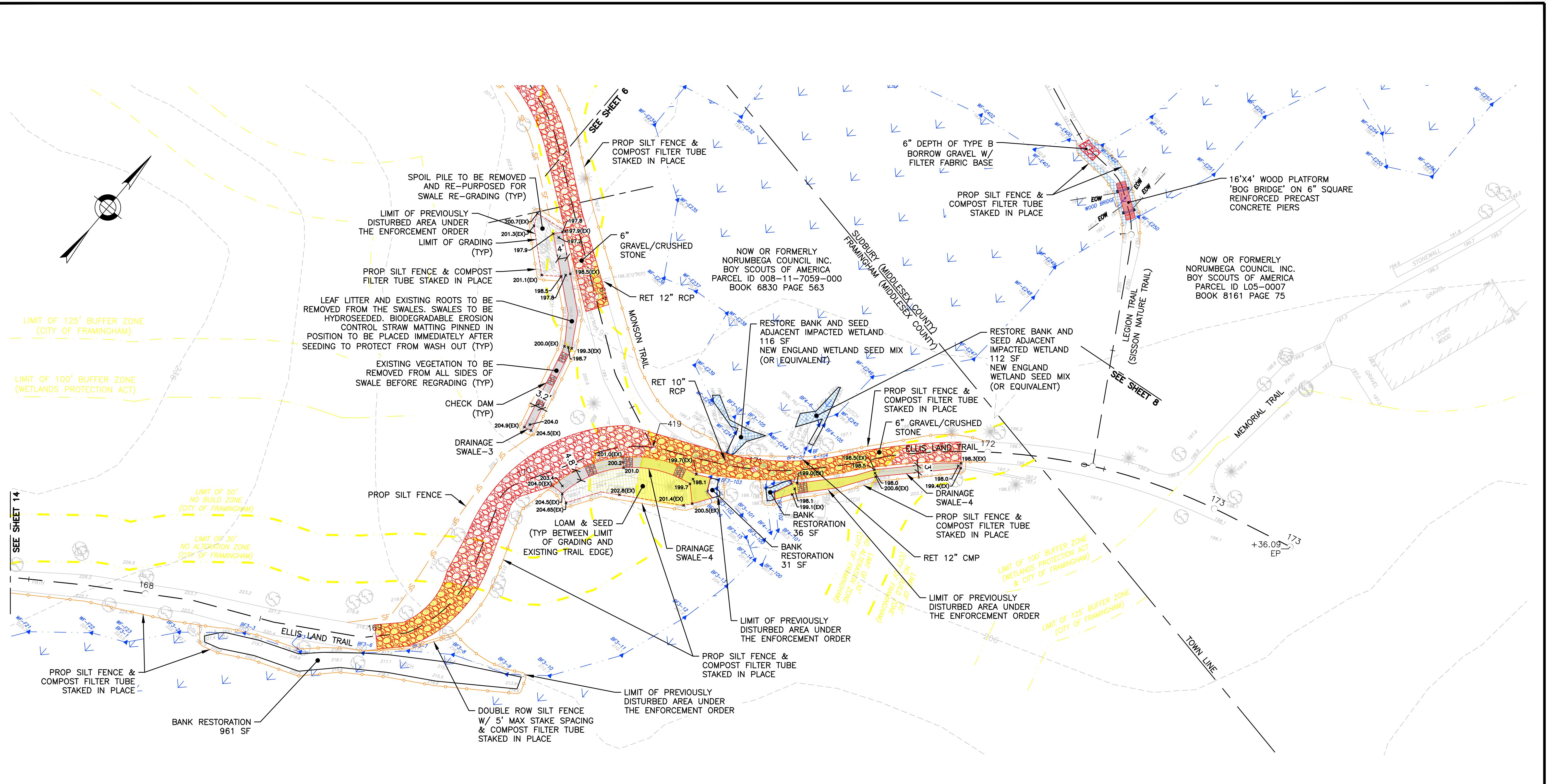


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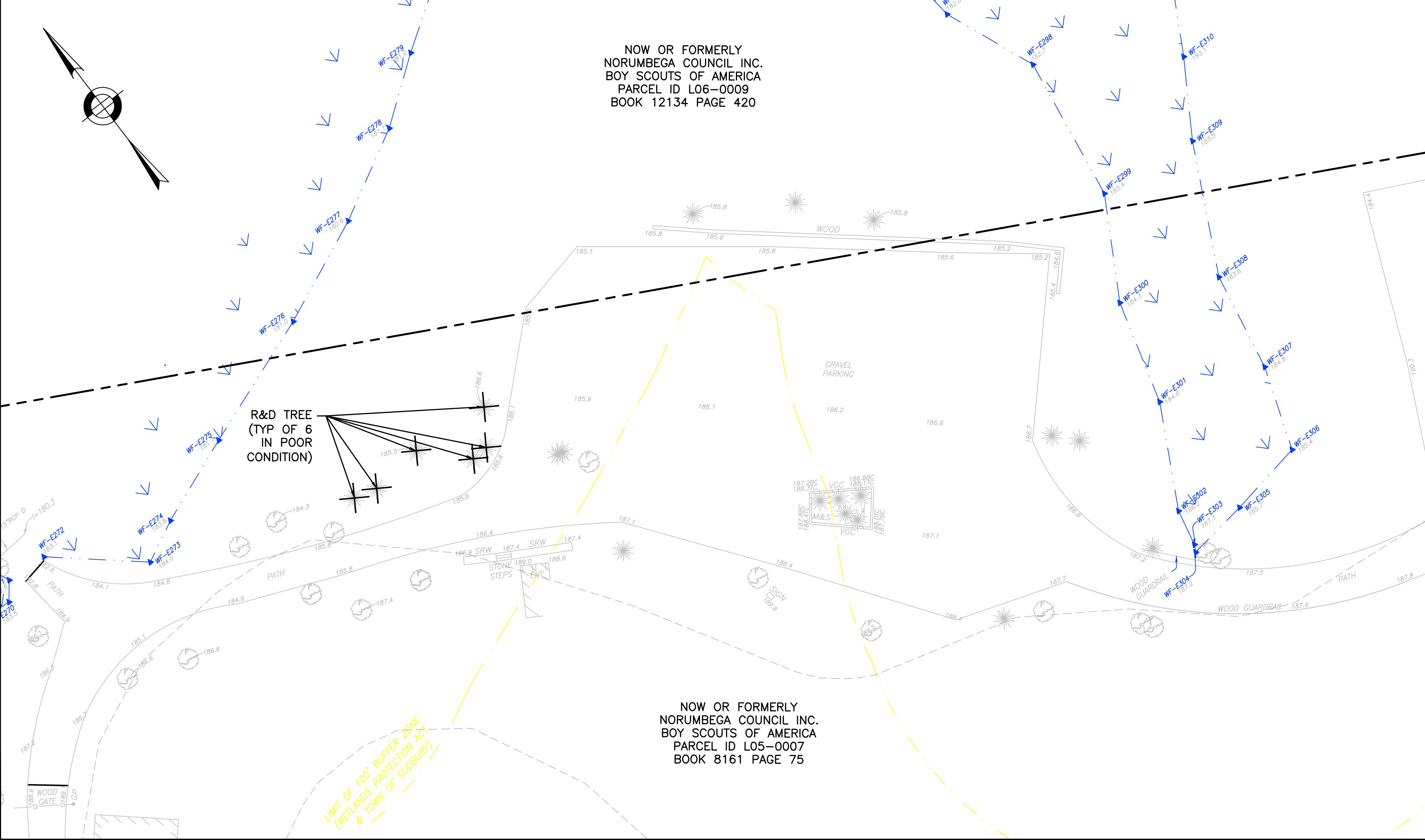
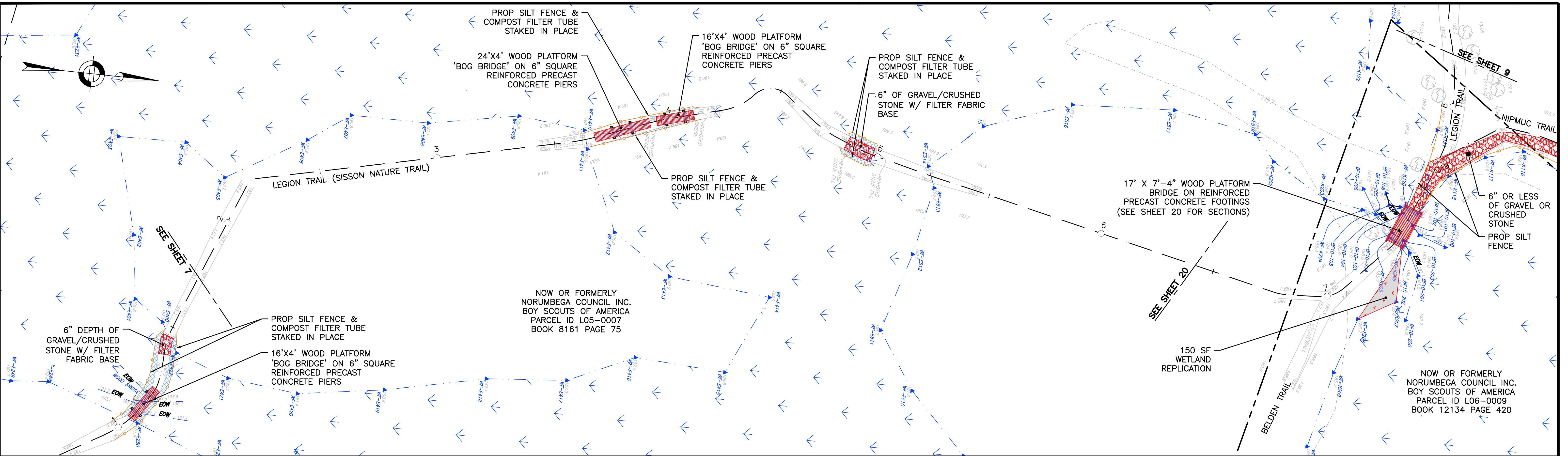
CITY OF FRAMINGHAM		
DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		958 SF
TEMPORARY UPLAND IMPACT		5,247 SF
PERMANENT WETLAND IMPACT	■	0 SF
TEMPORARY WETLAND IMPACT	■■■	229 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	161 LF
30' NO ALTERATION ZONE IMPACT	■■■	2,151 SF
50' NO BUILD ZONE IMPACT		4,715 SF
100' WETLAND BUFFER IMPACT	N/A	6,205 SF

TOWN OF SUDBURY		
DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		0 SF
TEMPORARY UPLAND IMPACT	■■■	2 SF
PERMANENT WETLAND IMPACT	■	11 SF
TEMPORARY WETLAND IMPACT	■■■	201 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	0 LF
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50' NO BUILD ZONE IMPACT		0 SF
100' WETLAND BUFFER IMPACT	N/A	2 SF

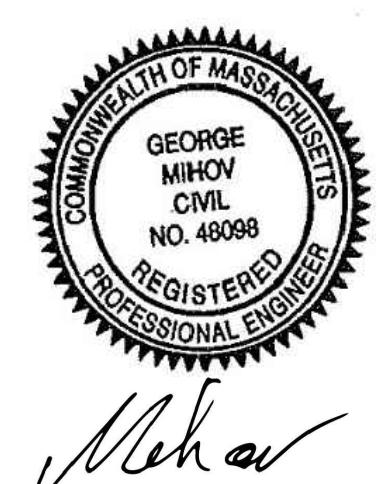


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NOBSCOT SCOUT RESERVATION PERMITTING & CONSTRUCTION PLANS						
HSH PROJECT NUMBER	DATE	DRAWN BY	CHKD. BY	APPRVD. BY	SHEET NO.	TOTAL SHEETS
2016033.02	10/24/22	JBC	JD	REL	8	22

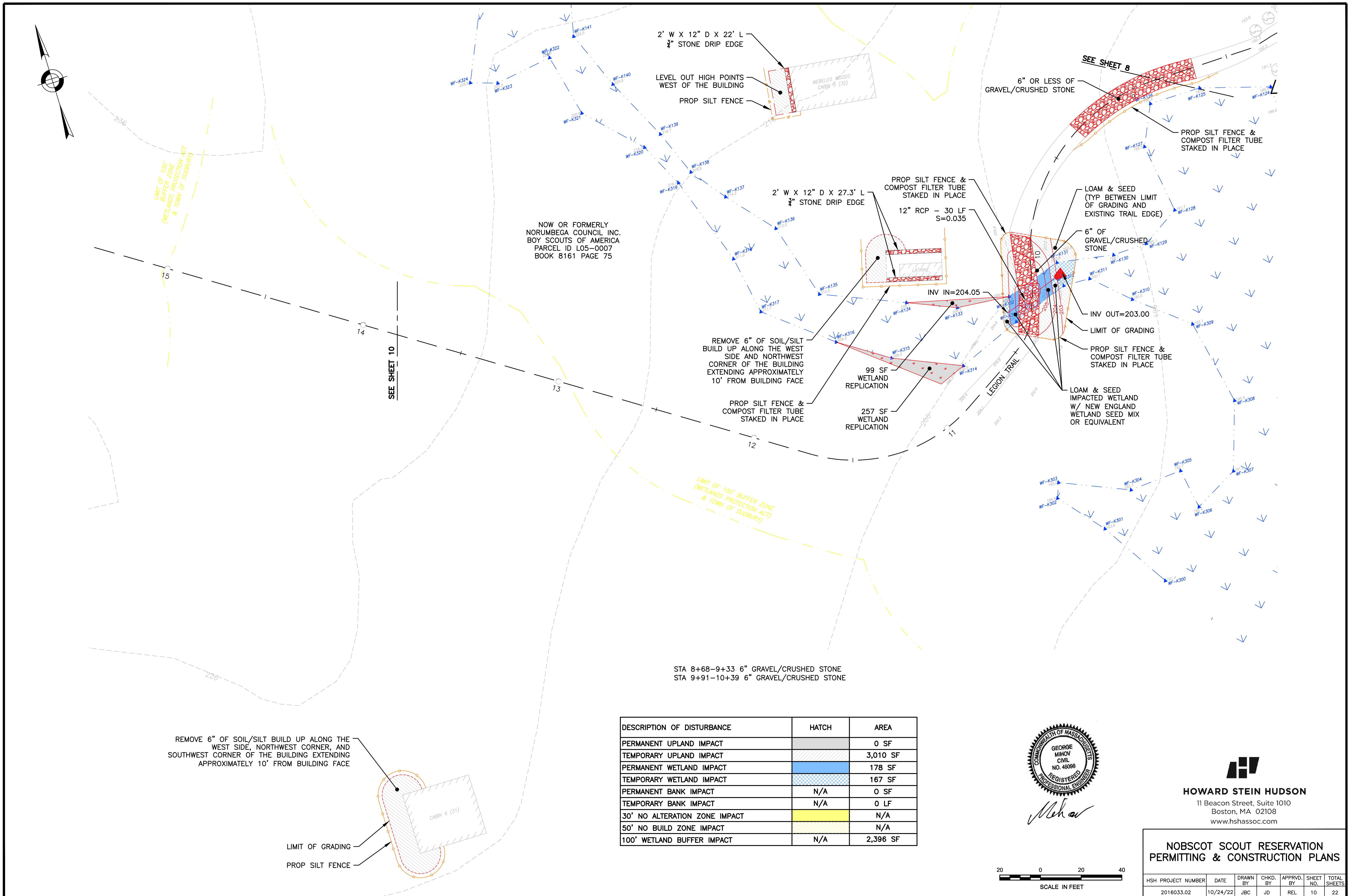


DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		11 SF
TEMPORARY UPLAND IMPACT		0 SF
PERMANENT WETLAND IMPACT		47 SF
TEMPORARY WETLAND IMPACT		348 SF
PERMANENT BANK IMPACT	N/A	0 SF
TEMPORARY BANK IMPACT	N/A	0 LF
30' NO ALTERATION ZONE IMPACT		N/A
50' NO BUILD ZONE IMPACT		N/A
100' WETLAND BUFFER IMPACT	N/A	11 SF



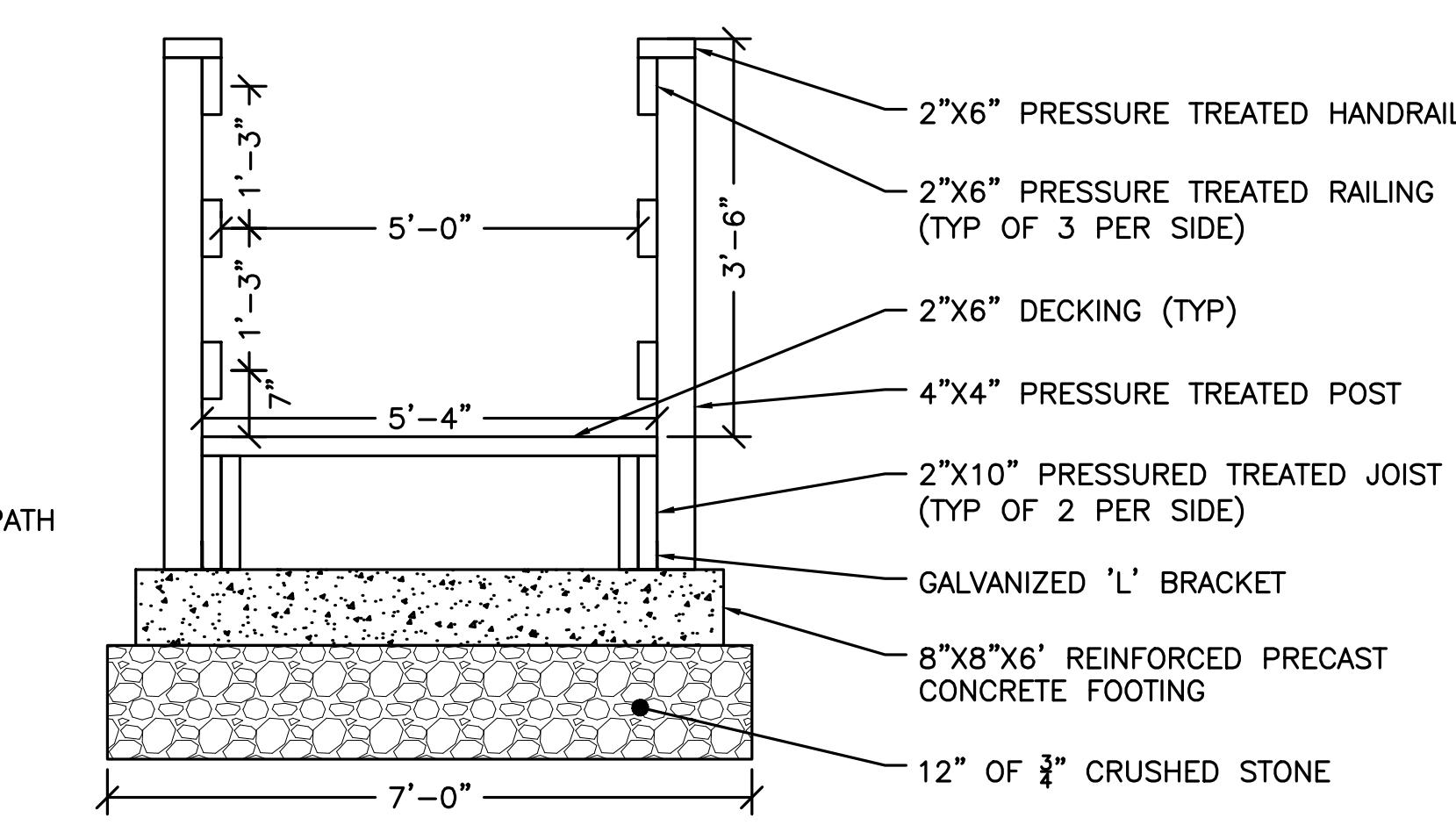
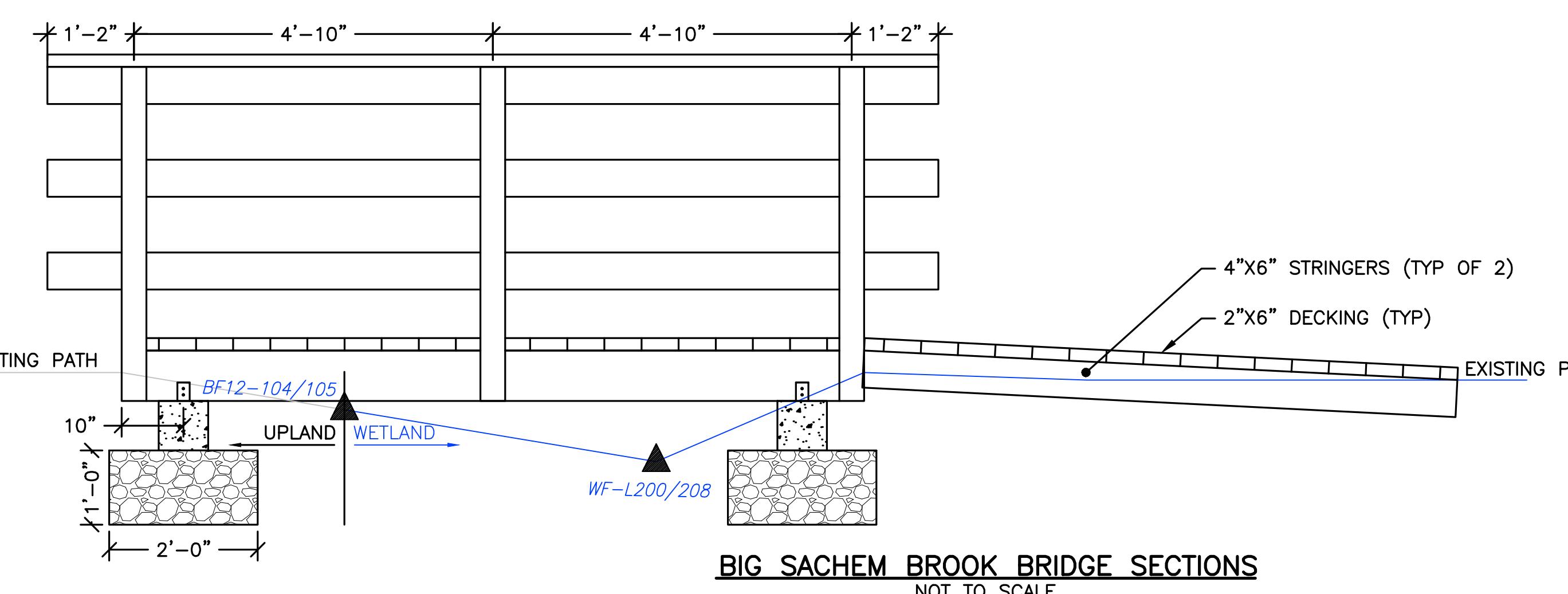
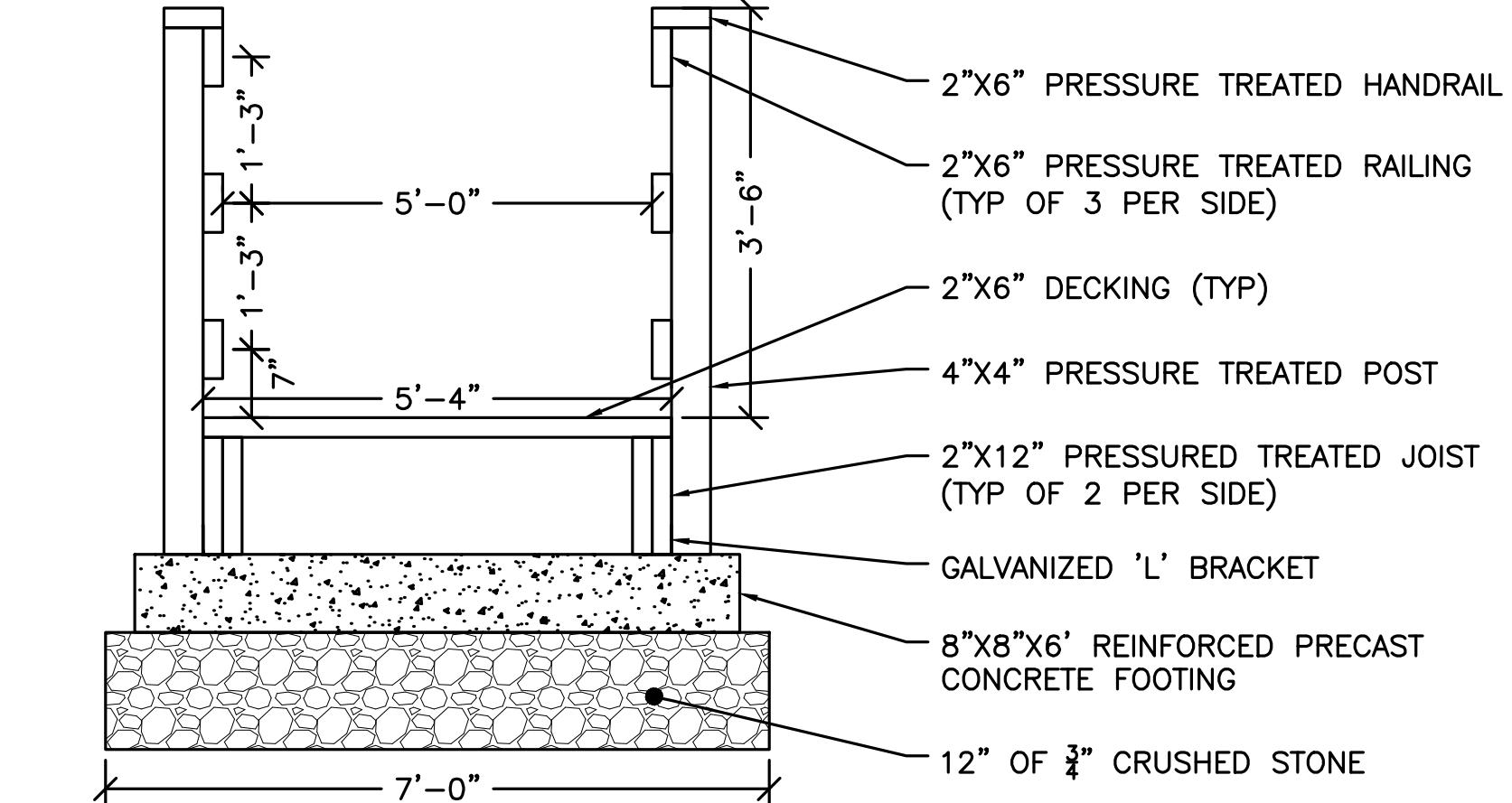
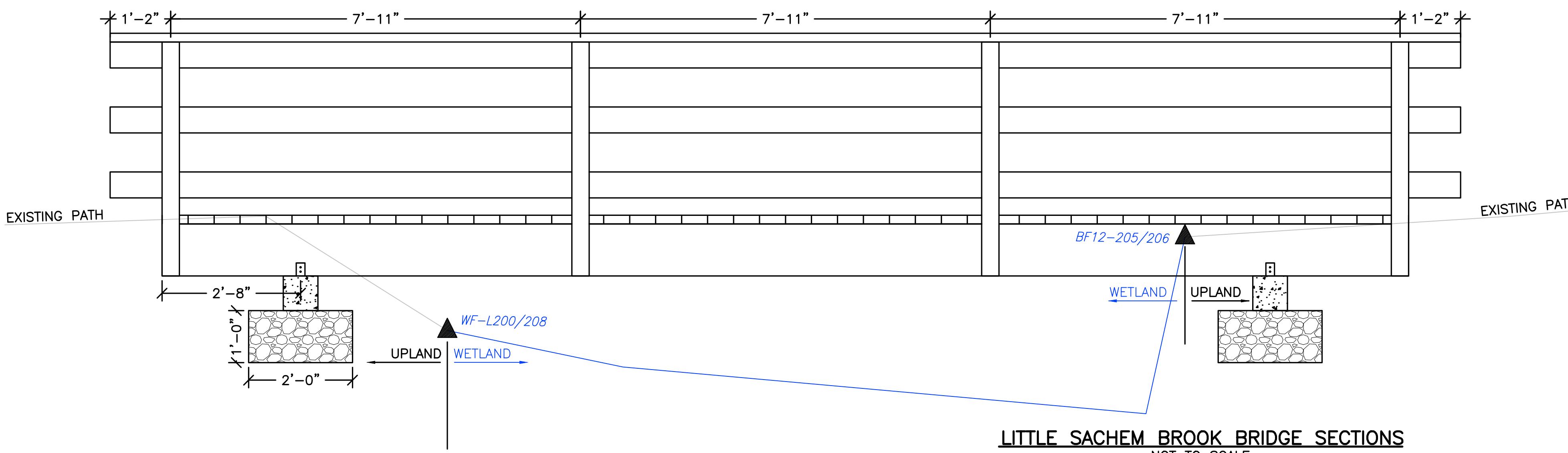
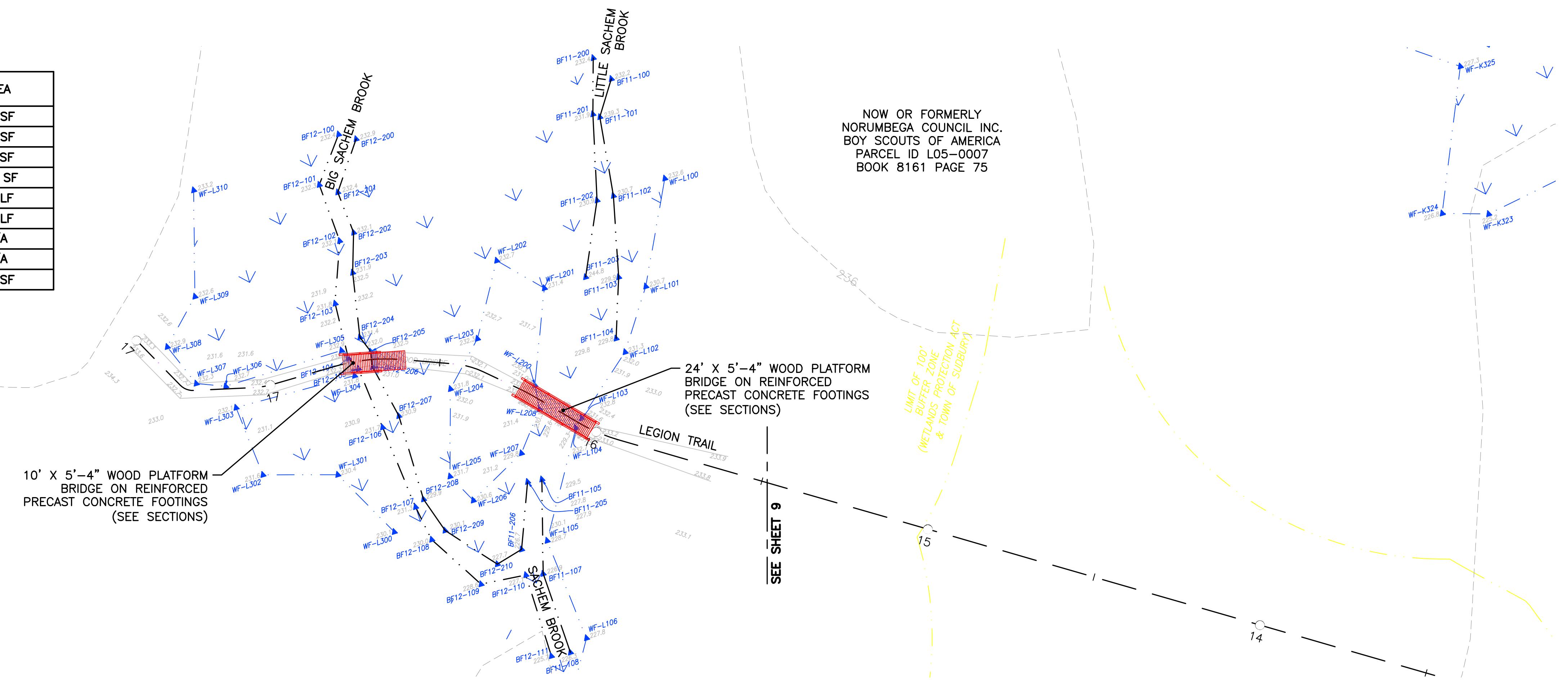
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NOBSCOT SCOUT RESERVATION PERMITTING & CONSTRUCTION PLANS						
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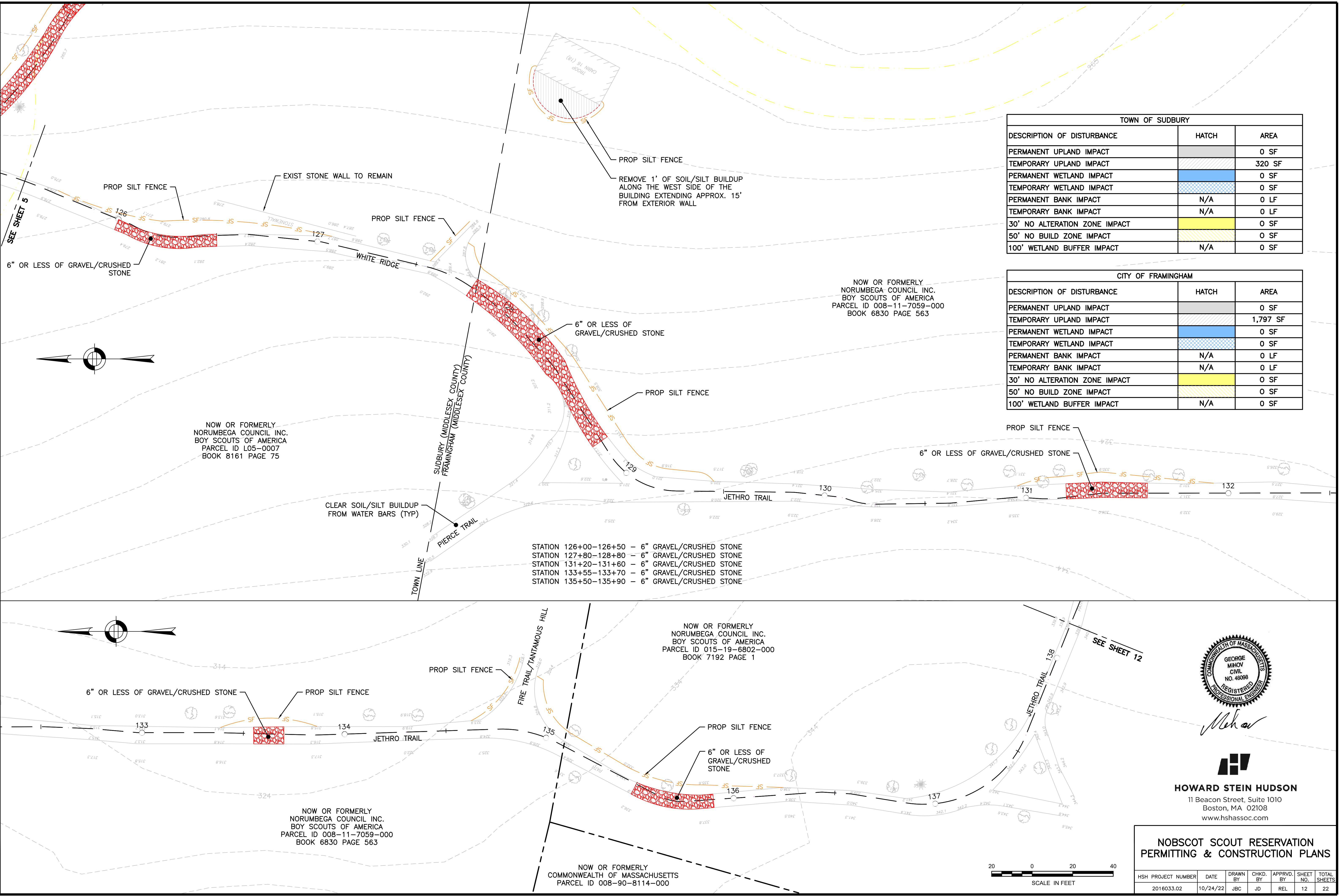
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Joseph Connolly

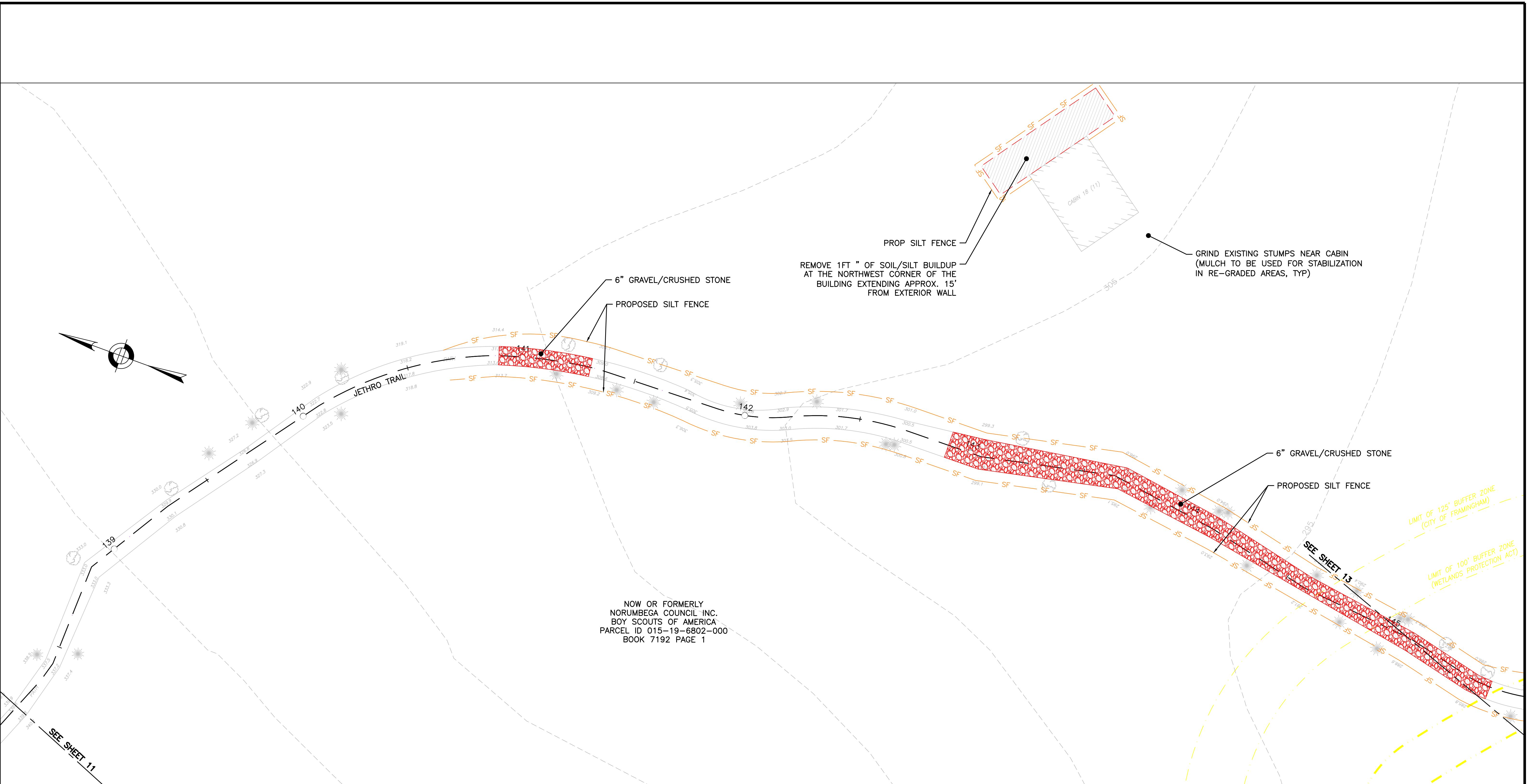
DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		36 SF
TEMPORARY UPLAND IMPACT		32 SF
PERMANENT WETLAND IMPACT	Blue	17 SF
TEMPORARY WETLAND IMPACT	Blue Dotted	125 SF
PERMANENT BANK IMPACT	N/A	10 LF
TEMPORARY BANK IMPACT	N/A	12 LF
30' NO ALTERATION ZONE IMPACT	Yellow	N/A
50' NO BUILD ZONE IMPACT		N/A
100' WETLAND BUFFER IMPACT	N/A	68 SF



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NOBSCOT SCOUT RESERVATION PERMITTING & CONSTRUCTION PLANS						
HSH PROJECT NUMBER	DATE	DRAWN BY	CHKD. BY	APPRVD. BY	SHEET NO.	TOTAL SHEETS
2016033.02	10/24/22	JBC	JD	REL	11	22





DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		0 SF
TEMPORARY UPLAND IMPACT		3,655 SF
PERMANENT WETLAND IMPACT		0 SF
TEMPORARY WETLAND IMPACT		0 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	0 LF
30' NO ALTERATION ZONE IMPACT		0 SF
50' NO BUILD ZONE IMPACT		0 SF
100' WETLAND BUFFER IMPACT	N/A	462 SF

STATION 140+90-141+30 - 6" GRAVEL/CRUSHED STONE
STATION 142+90-145+50 - 6" GRAVEL/CRUSHED STONE

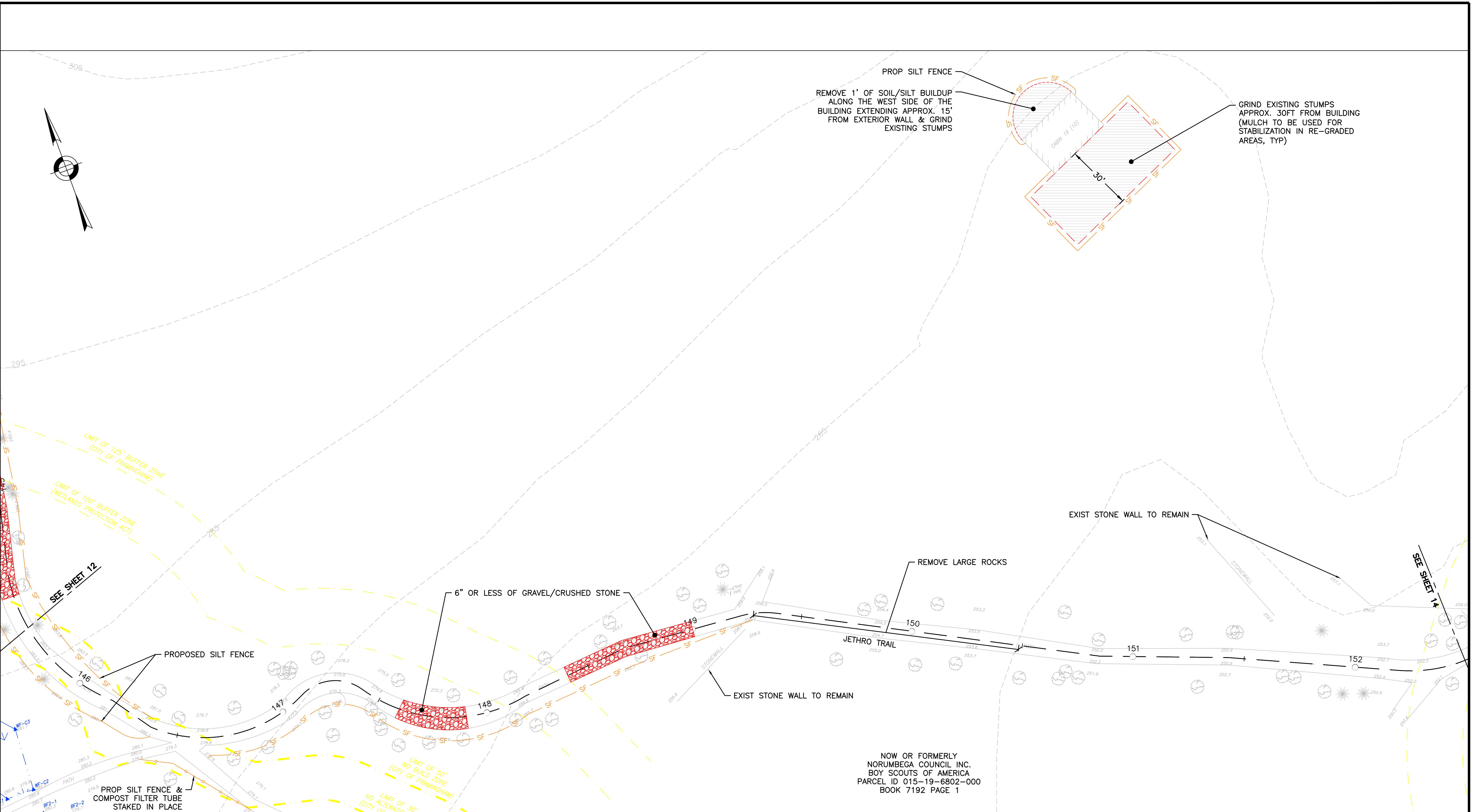


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2016033.02	10/24/22	JBC	JD	REL	13	22



DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		0 SF
TEMPORARY UPLAND IMPACT		2,933 SF
PERMANENT WETLAND IMPACT		0 SF
TEMPORARY WETLAND IMPACT	Diagonal Hatching	0 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	0 LF
30' NO ALTERATION ZONE IMPACT	Yellow Hatching	0 SF
50' NO BUILD ZONE IMPACT		0 SF
100' WETLAND BUFFER IMPACT	N/A	300 SF

STATION 147+60-147+90 - 6" GRAVEL/CRUSHED STONE
 STATION 148+40-149+00 - 6" GRAVEL/CRUSHED STONE
 STATION 149+30-150+50 - REMOVE LARGE ROCKS

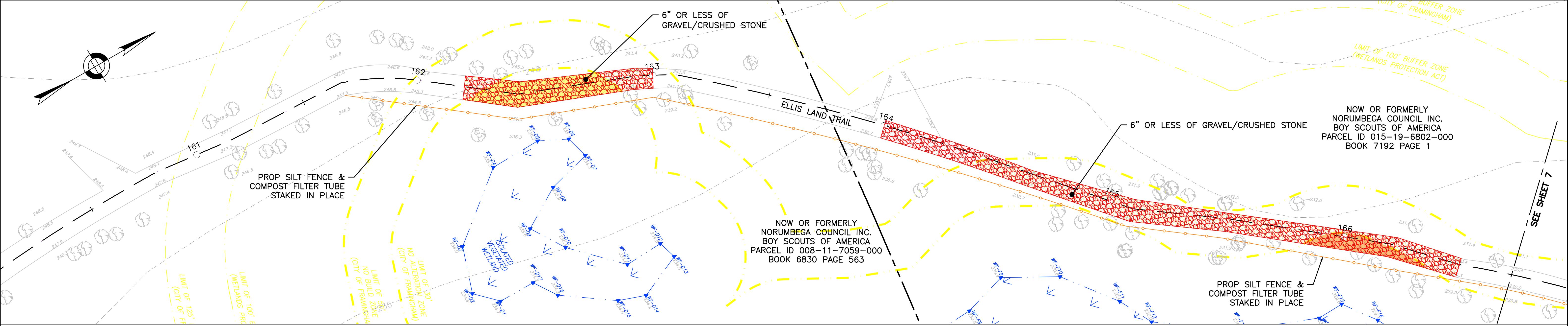
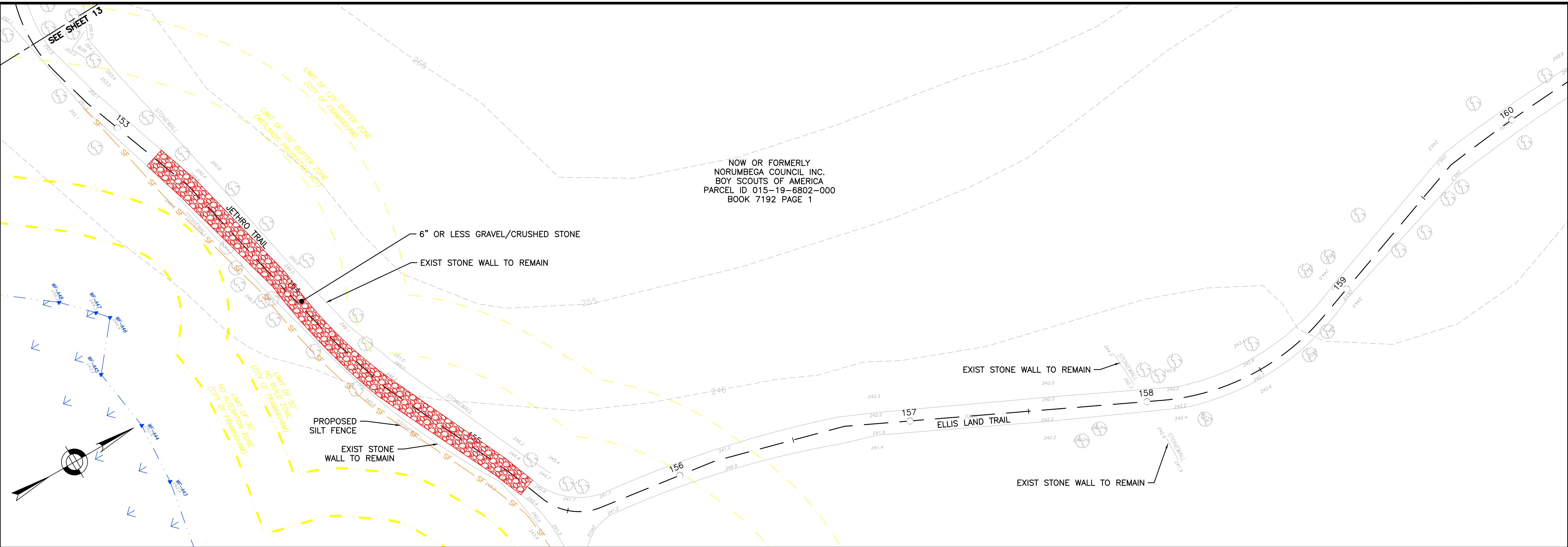


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2016033.02	10/24/22	JBC	JD	REL	14	22



DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		0 SF
TEMPORARY UPLAND IMPACT		4,591 SF
PERMANENT WETLAND IMPACT		0 SF
TEMPORARY WETLAND IMPACT		0 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	0 LF
30' NO ALTERATION ZONE IMPACT		782 SF
50' NO BUILD ZONE IMPACT		1,950 SF
100' WETLAND BUFFER IMPACT	N/A	4,591 SF

STATION 153+20-155+30 - 6" GRAVEL/CRUSHED STONE
STATION 162+20-163+00 - 6" GRAVEL/CRUSHED STONE
STATION 164+00-166+50 - 6" GRAVEL/CRUSHED STONE

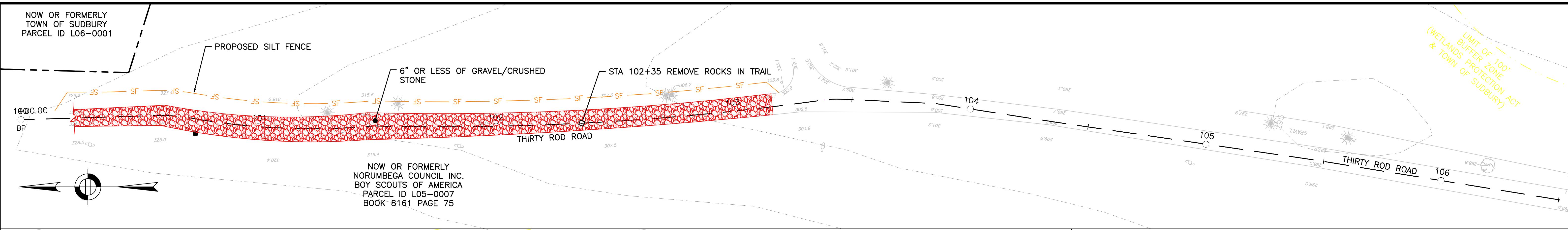


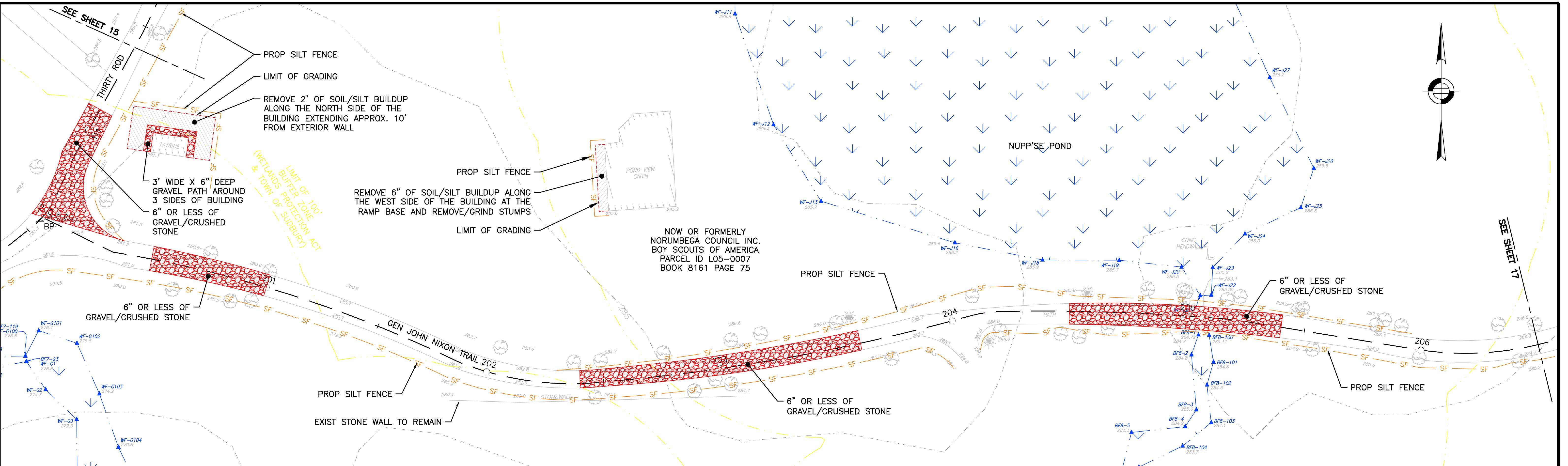
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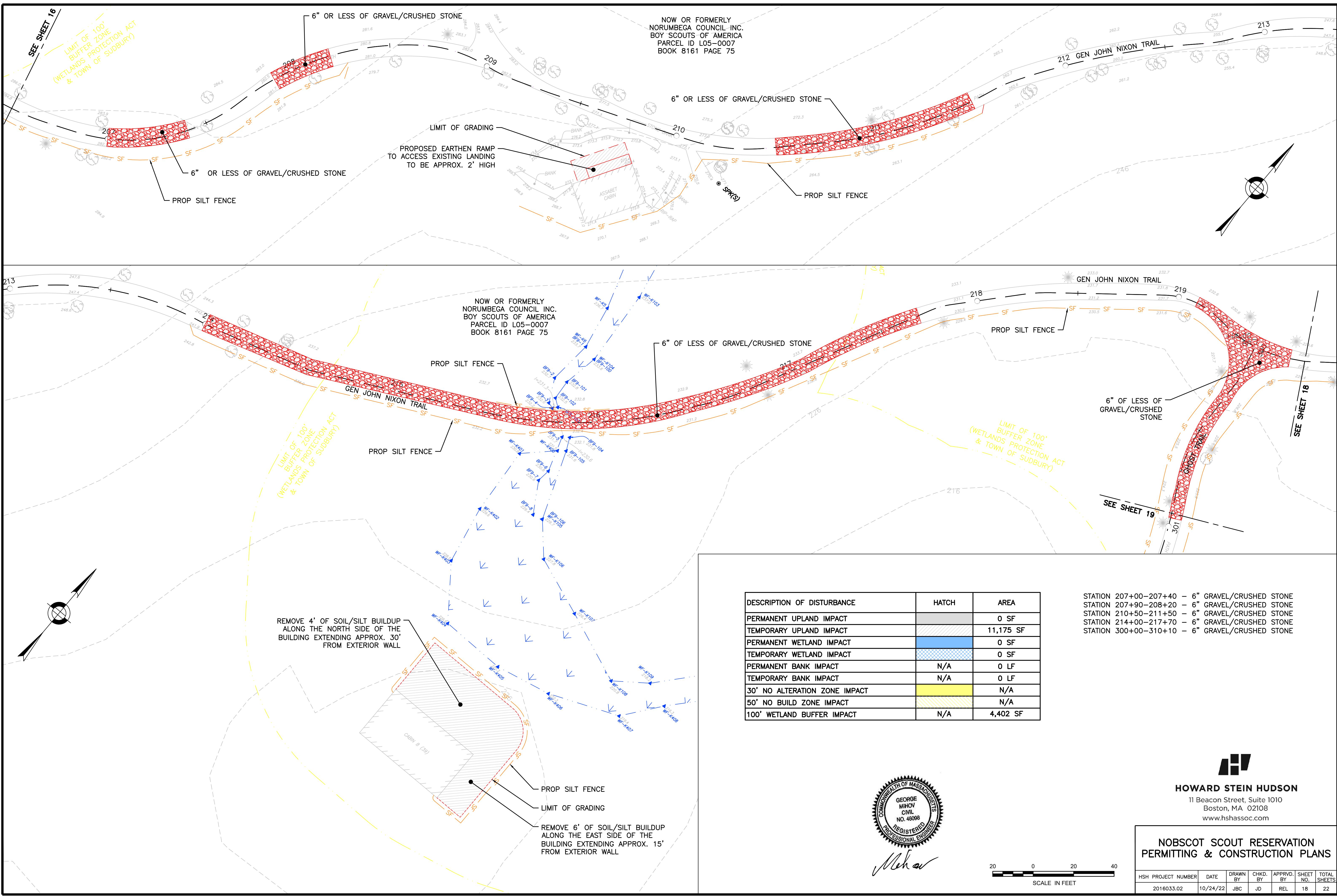
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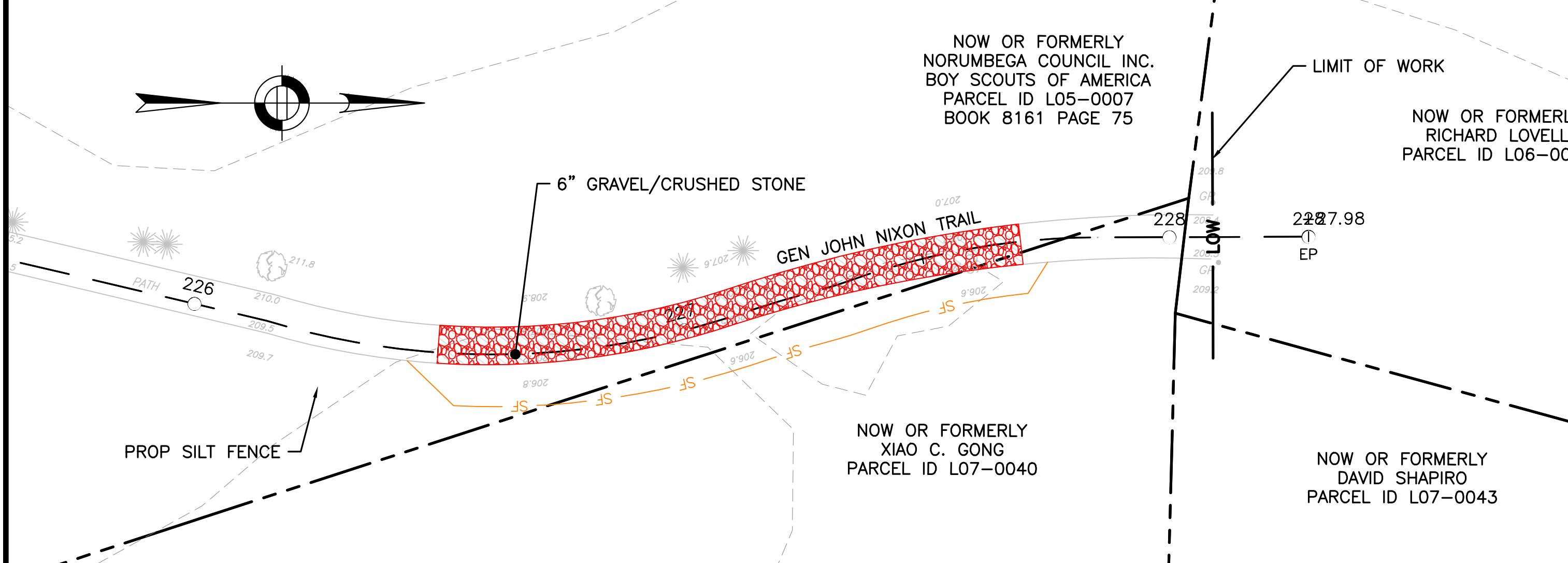
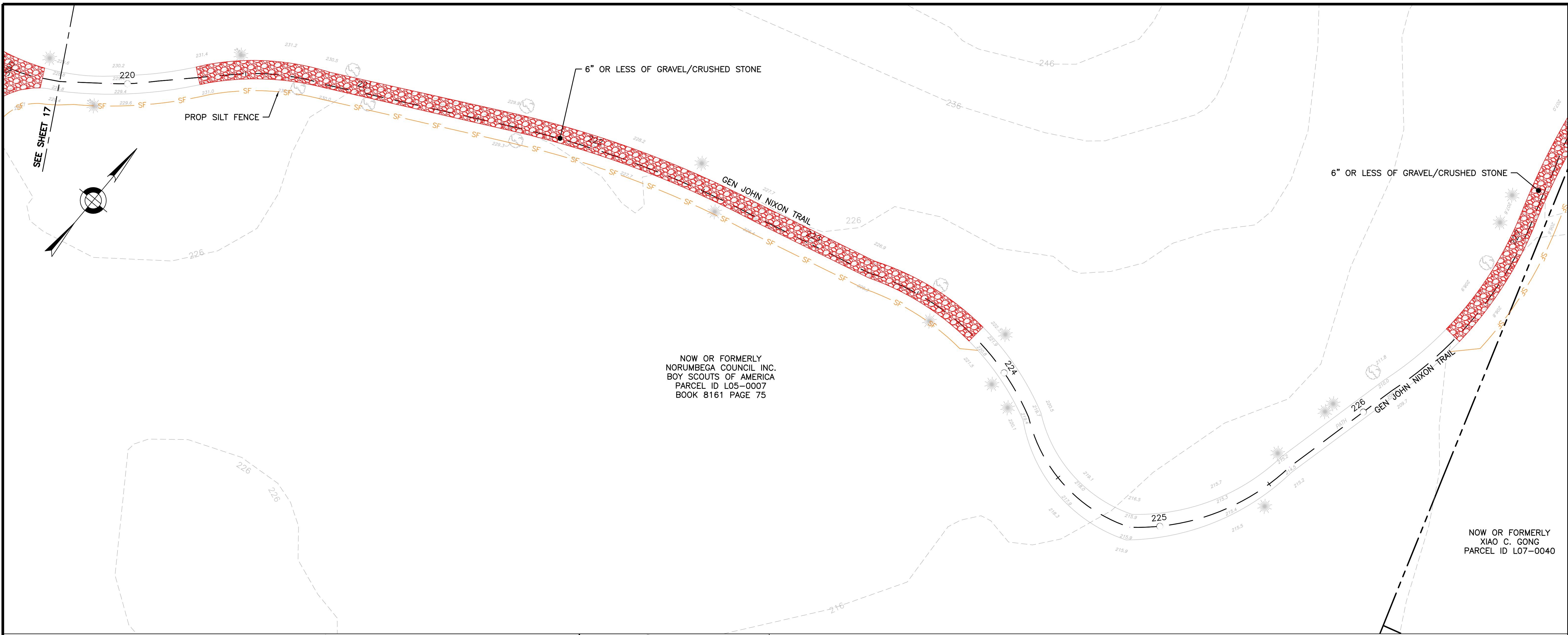
HSH PROJECT NUMBER	DATE	DRAWN BY	CHKD. BY	APPRVD. BY	SHEET NO.	TOTAL SHEETS
2016033.02	10/24/22	JBC	JD	REL	15	22







10/24/2022 L:\16033\CURRENTCUTSHEETS\16033_NOI PLANS.dwg



DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		0 SF
TEMPORARY UPLAND IMPACT	/	3,513 SF
PERMANENT WETLAND IMPACT		0 SF
TEMPORARY WETLAND IMPACT	+	0 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	0 LF
30' NO ALTERATION ZONE IMPACT		N/A
50' NO BUILD ZONE IMPACT	/	N/A
100' WETLAND BUFFER IMPACT	N/A	0 SF



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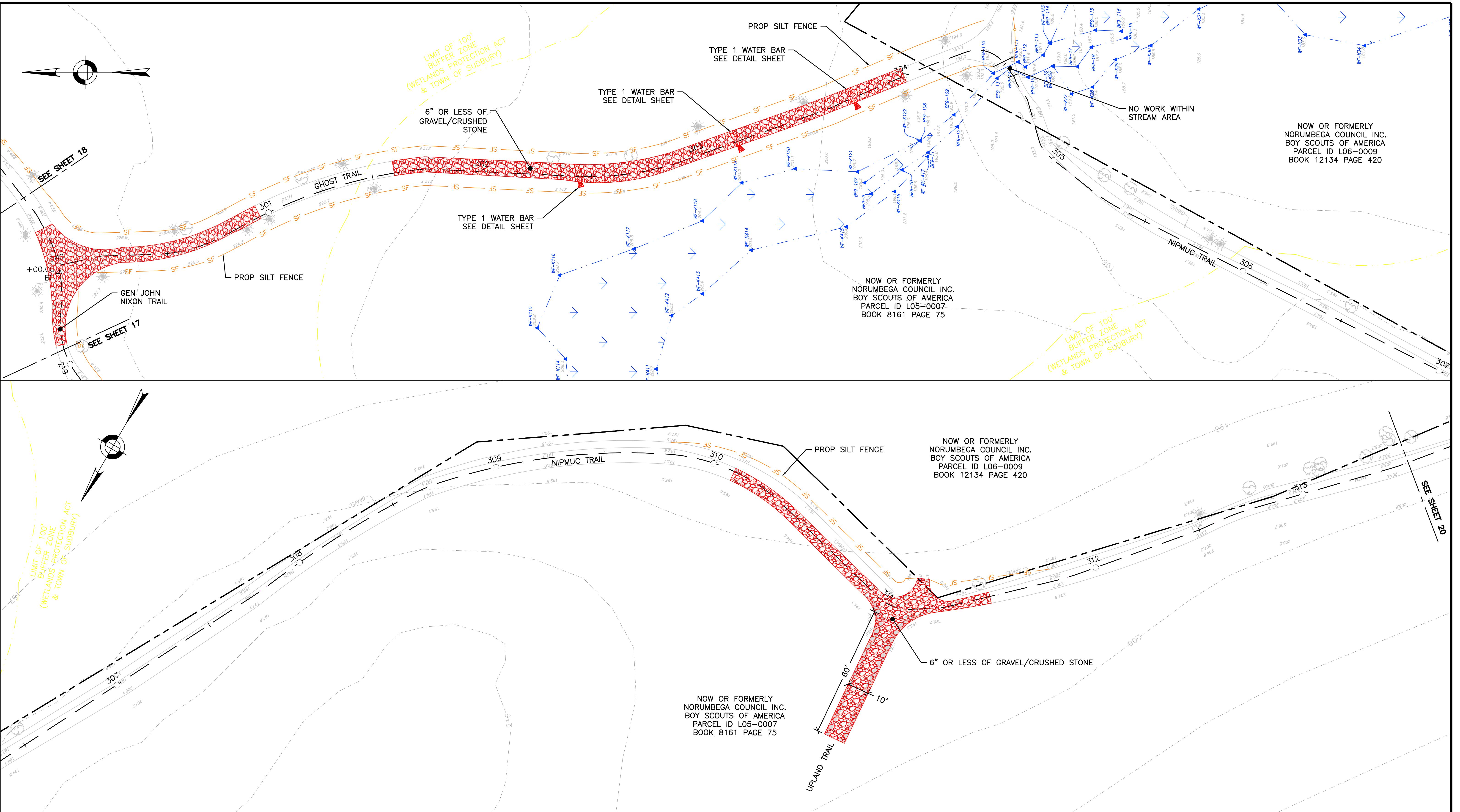
NOT SCOUT REFEREE

SCOUT RESERVE CONSTRUCTION

DESIGN & CONSTRUCTION

OBSCOT SCOUT RESERVATION FITTING & CONSTRUCTION PLANS

SH	PROJECT NUMBER	DATE	DRAWN BY	CHKD. BY	APPRVD. BY	SHEET NO.	TOTAL SHEETS
	2016033.02	10/24/22	JBC	JD	REL	19	22



DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		316 SF
TEMPORARY UPLAND IMPACT		3,069 SF
PERMANENT WETLAND IMPACT		0 SF
TEMPORARY WETLAND IMPACT		0 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	0 LF
30' NO ALTERATION ZONE IMPACT		N/A
50' NO BUILD ZONE IMPACT		N/A
100' WETLAND BUFFER IMPACT	N/A	1,787 SF

STATION 301+60-304+00 - 6" GRAVEL/CRUSHED STONE
STATION 310+10-311+50 - 6" GRAVEL/CRUSHED STONE

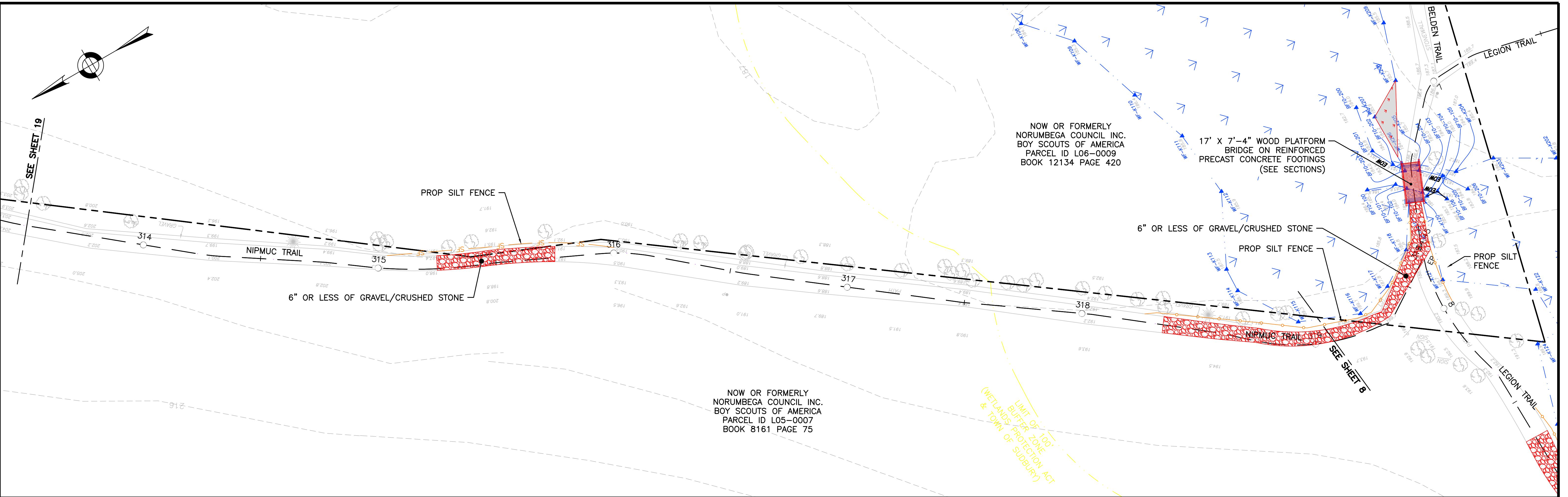


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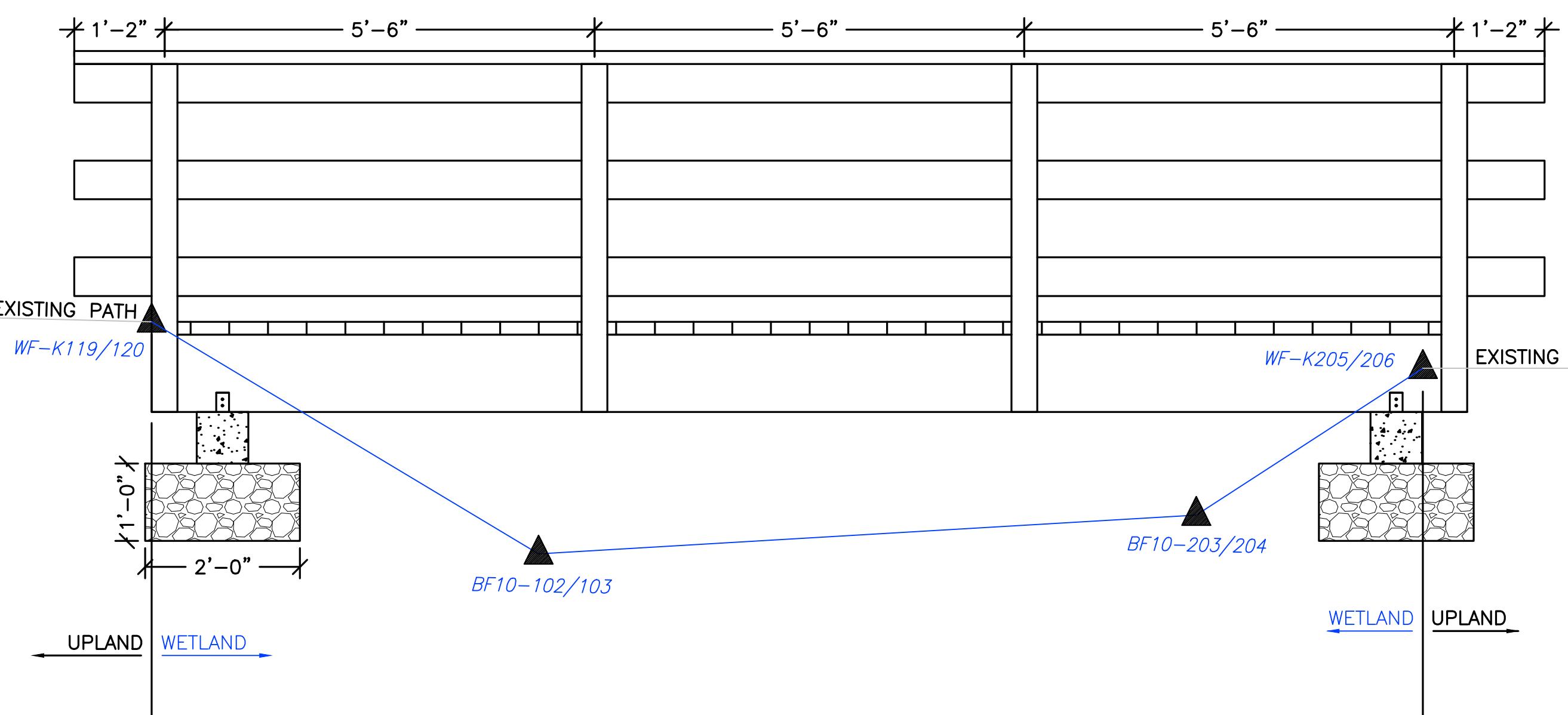
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2016033.02	10/24/22	JBC	JD	REL	20	22

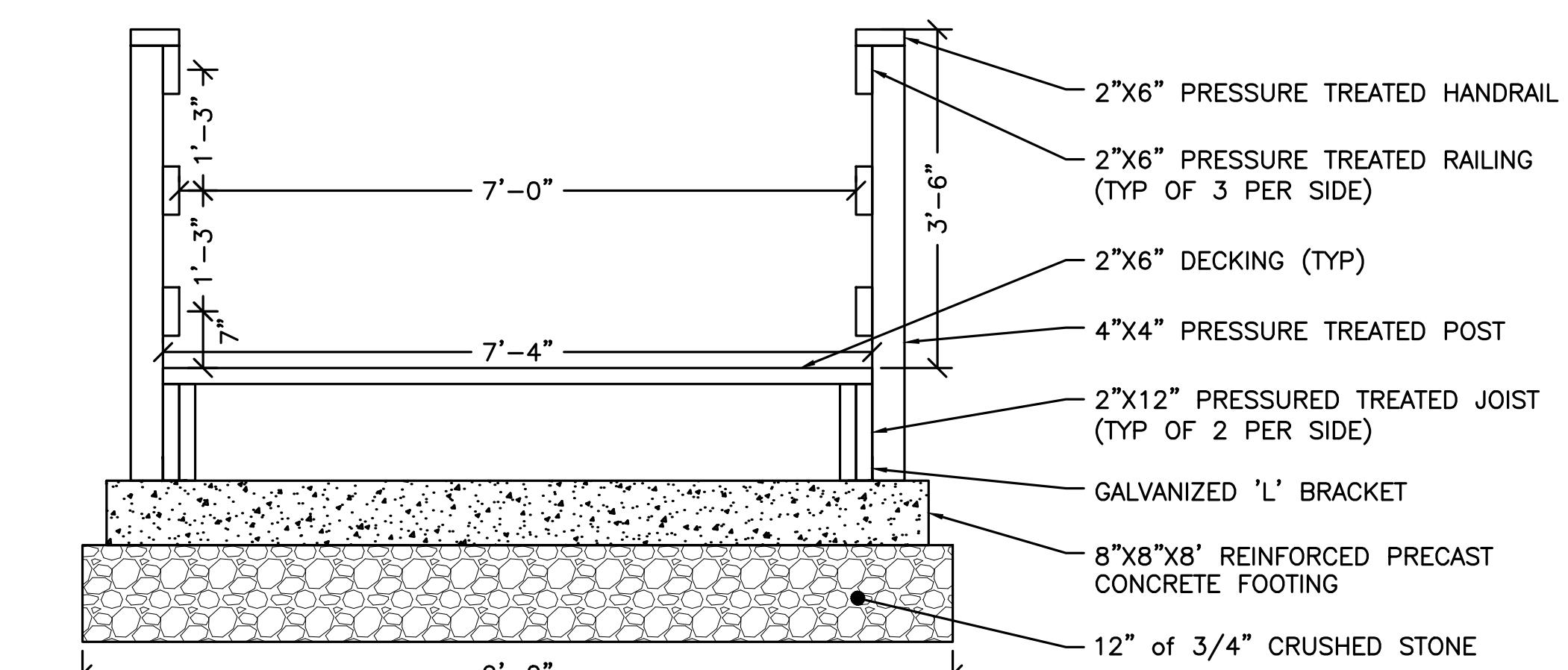


STATION 7+53+7+78 - 6" GRAVEL/CRUSHED STONE
STATION 315+25-315+75 - 6" GRAVEL/CRUSHED STONE
STATION 318+25-319+65 - 6" GRAVEL CRUSHED STONE

DESCRIPTION OF DISTURBANCE	HATCH	AREA
PERMANENT UPLAND IMPACT		0 SF
TEMPORARY UPLAND IMPACT		786 SF
PERMANENT WETLAND IMPACT		0 SF
TEMPORARY WETLAND IMPACT		34 SF
PERMANENT BANK IMPACT	N/A	0 LF
TEMPORARY BANK IMPACT	N/A	16 LF
30' NO ALTERATION ZONE IMPACT		N/A SF
50' NO BUILD ZONE IMPACT		N/A
100' WETLAND BUFFER IMPACT	N/A	470 SF



BELDEN BRIDGE SECTIONS
NOT TO SCALE



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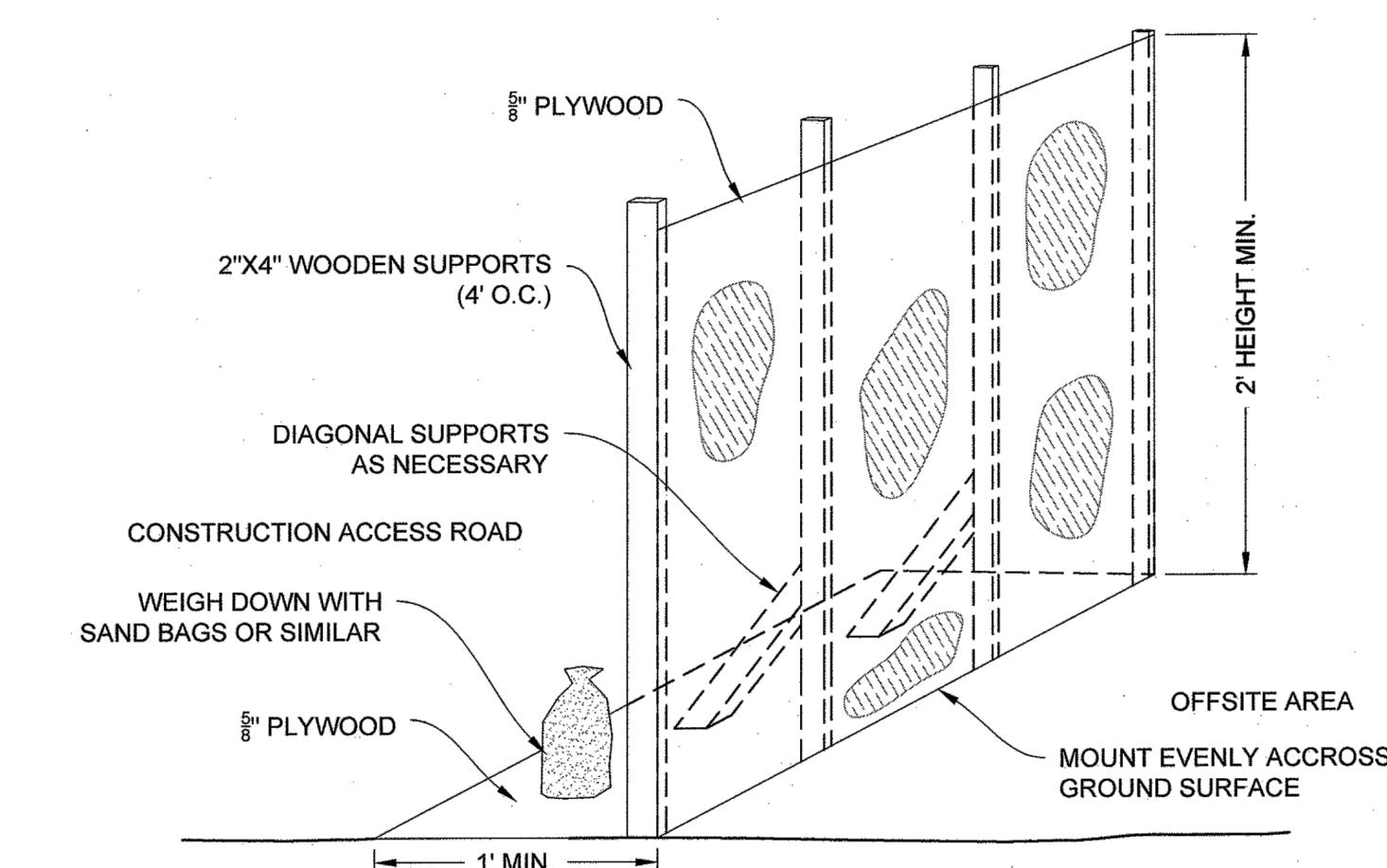
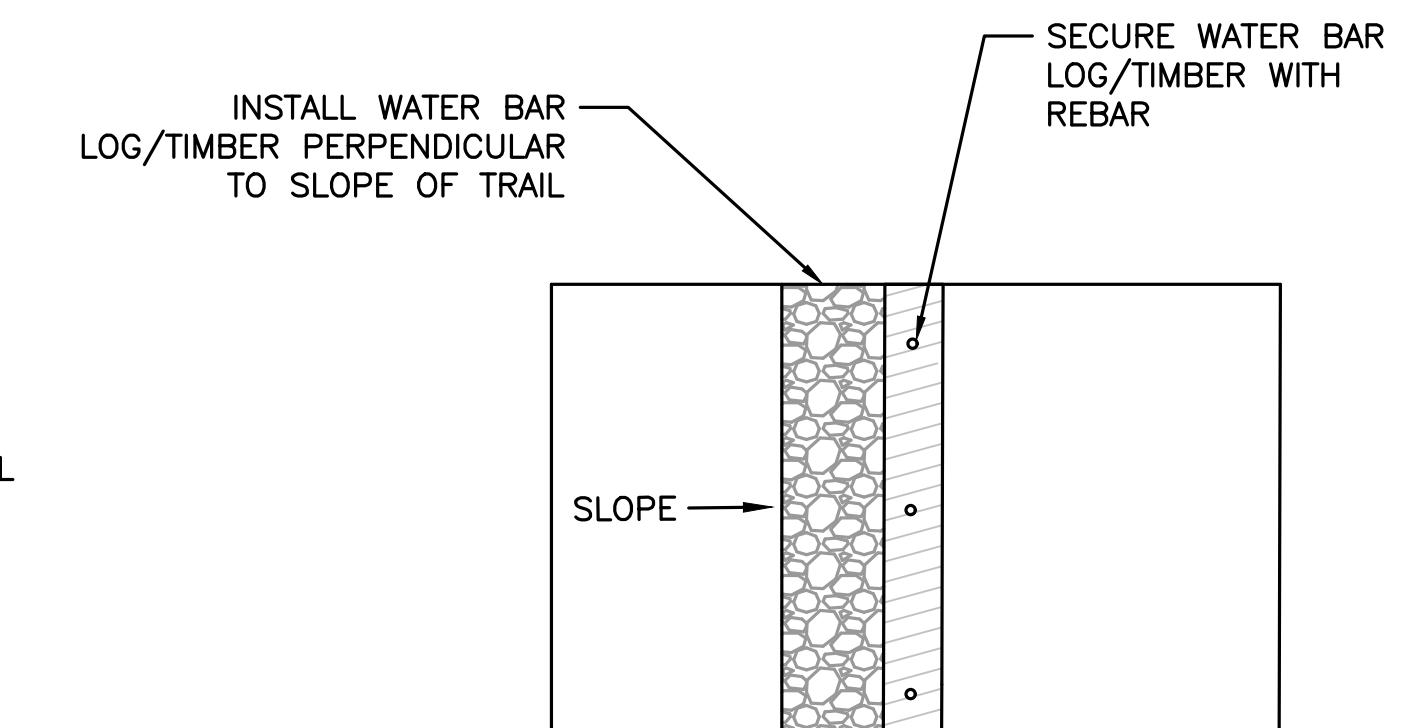
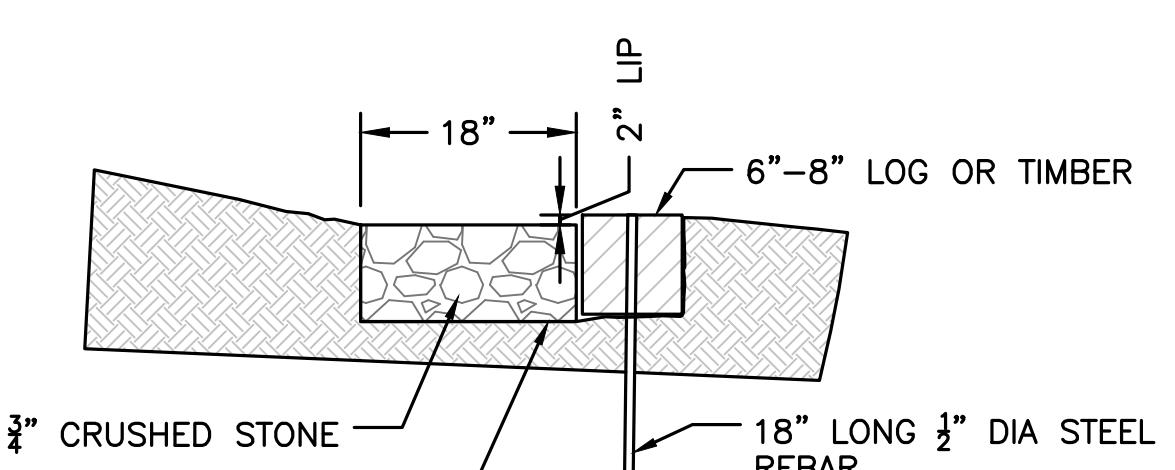
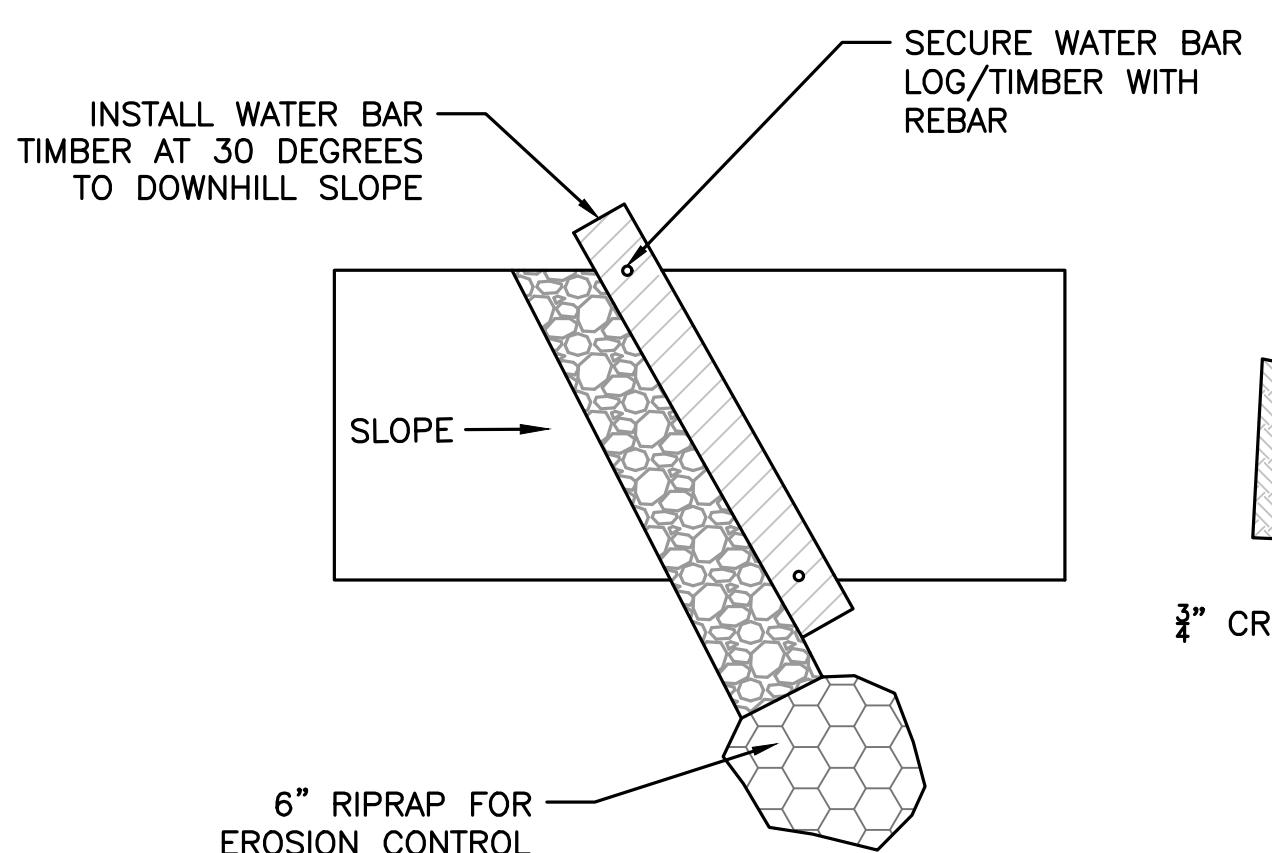
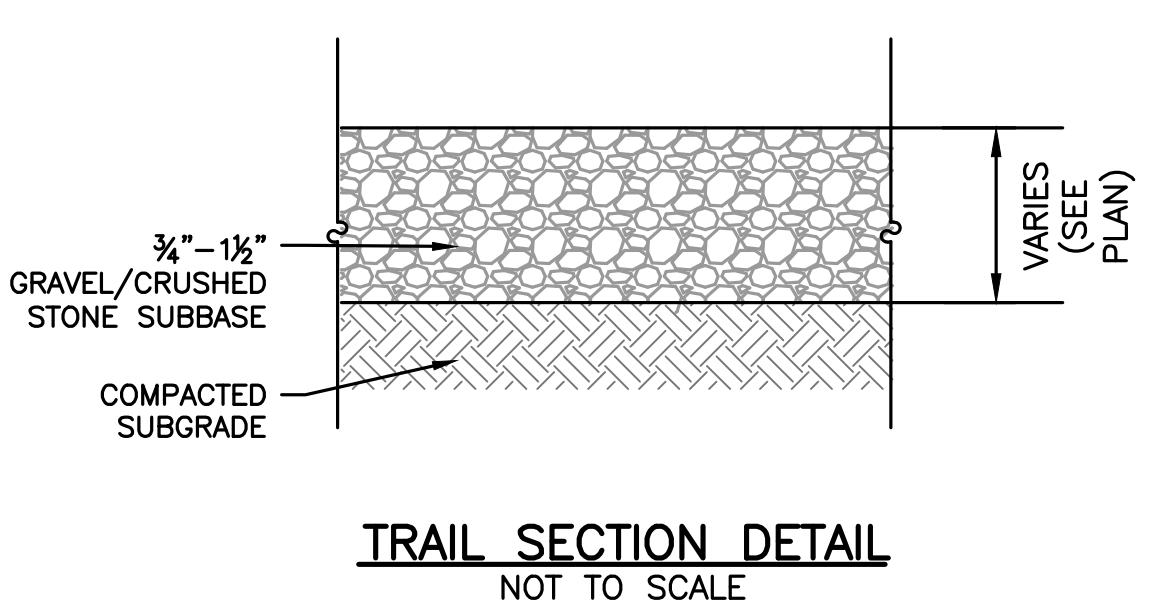
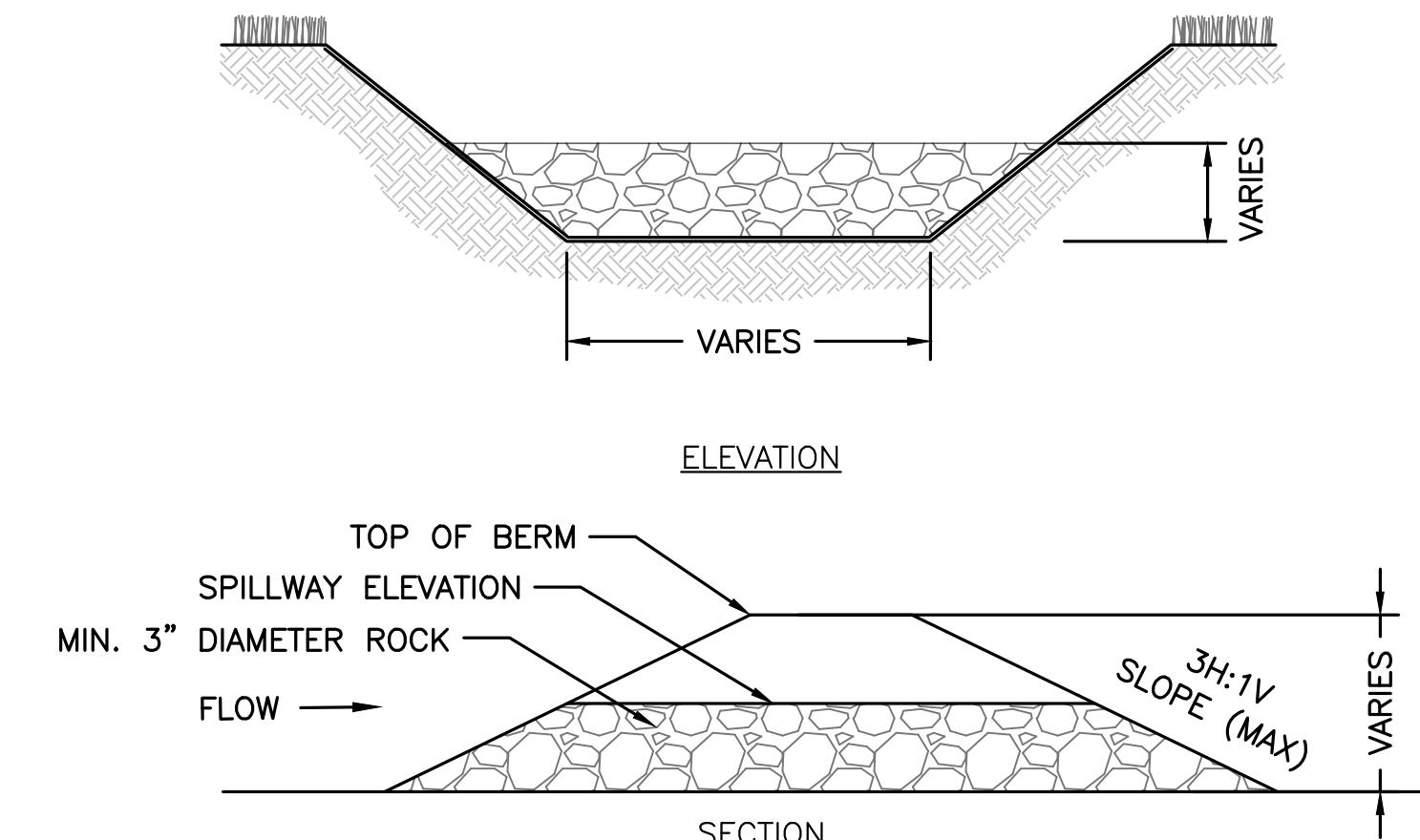
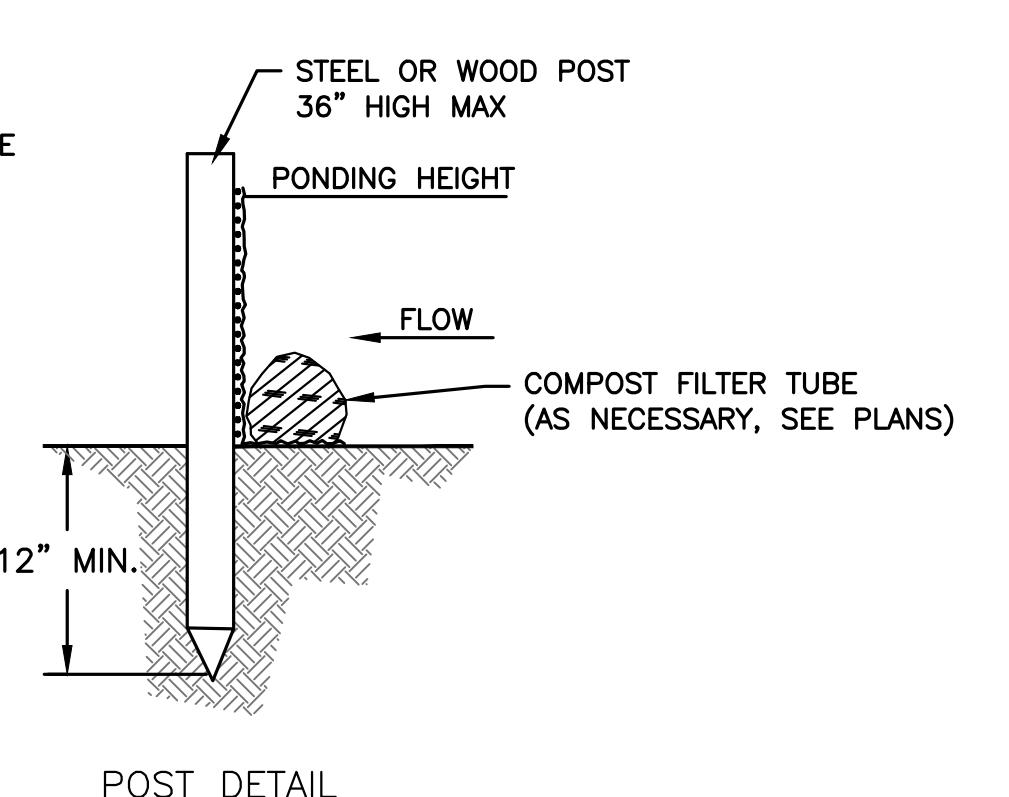
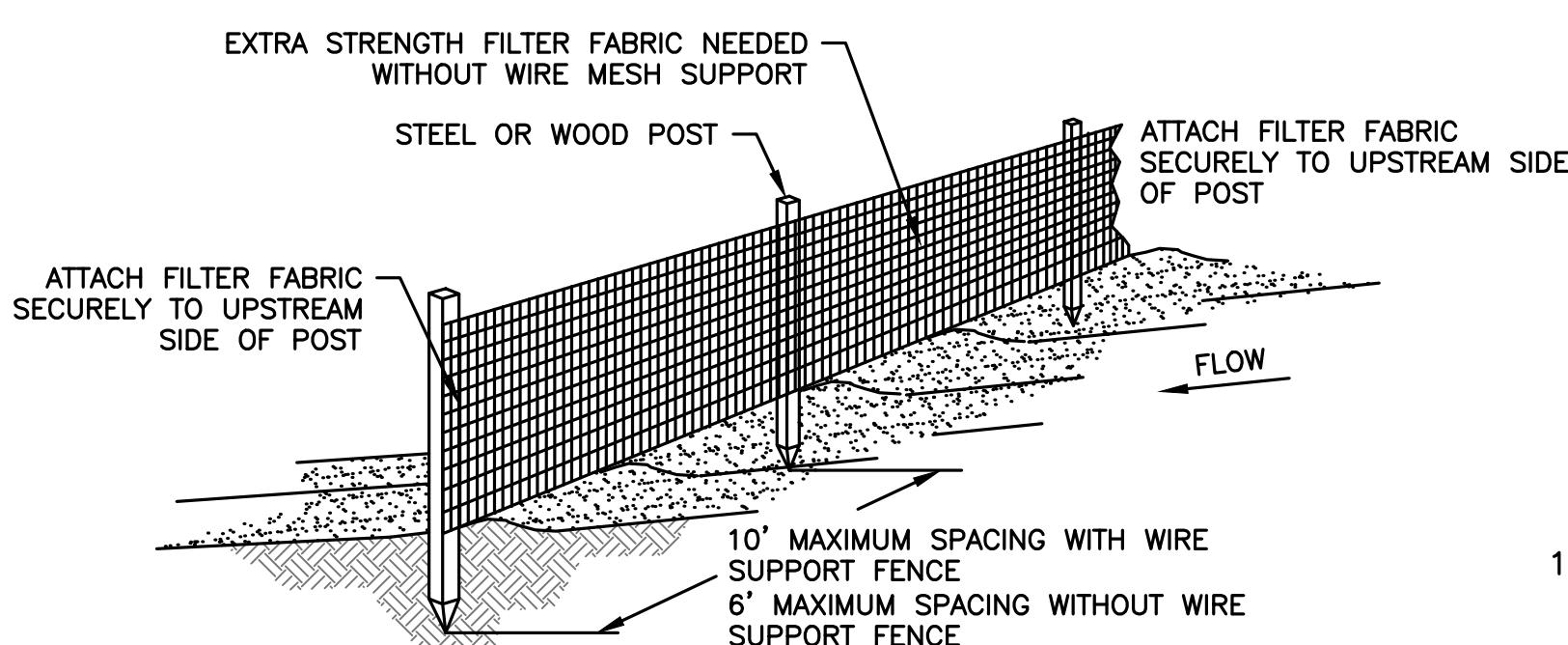
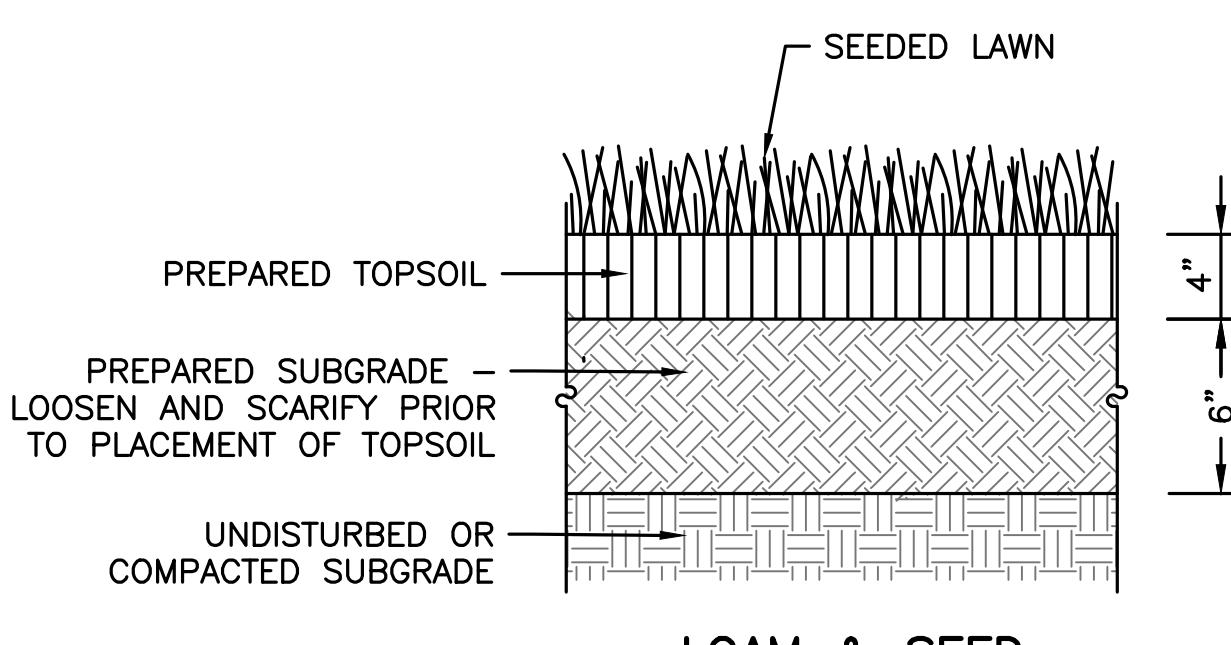
NOBSCOT SCOUT RESERVATION PERMITTING & CONSTRUCTION PLANS						
HSH PROJECT NUMBER	DATE	DRAWN BY	CHKD. BY	APPRVD. BY	HEET NO.	TOTAL SHEETS
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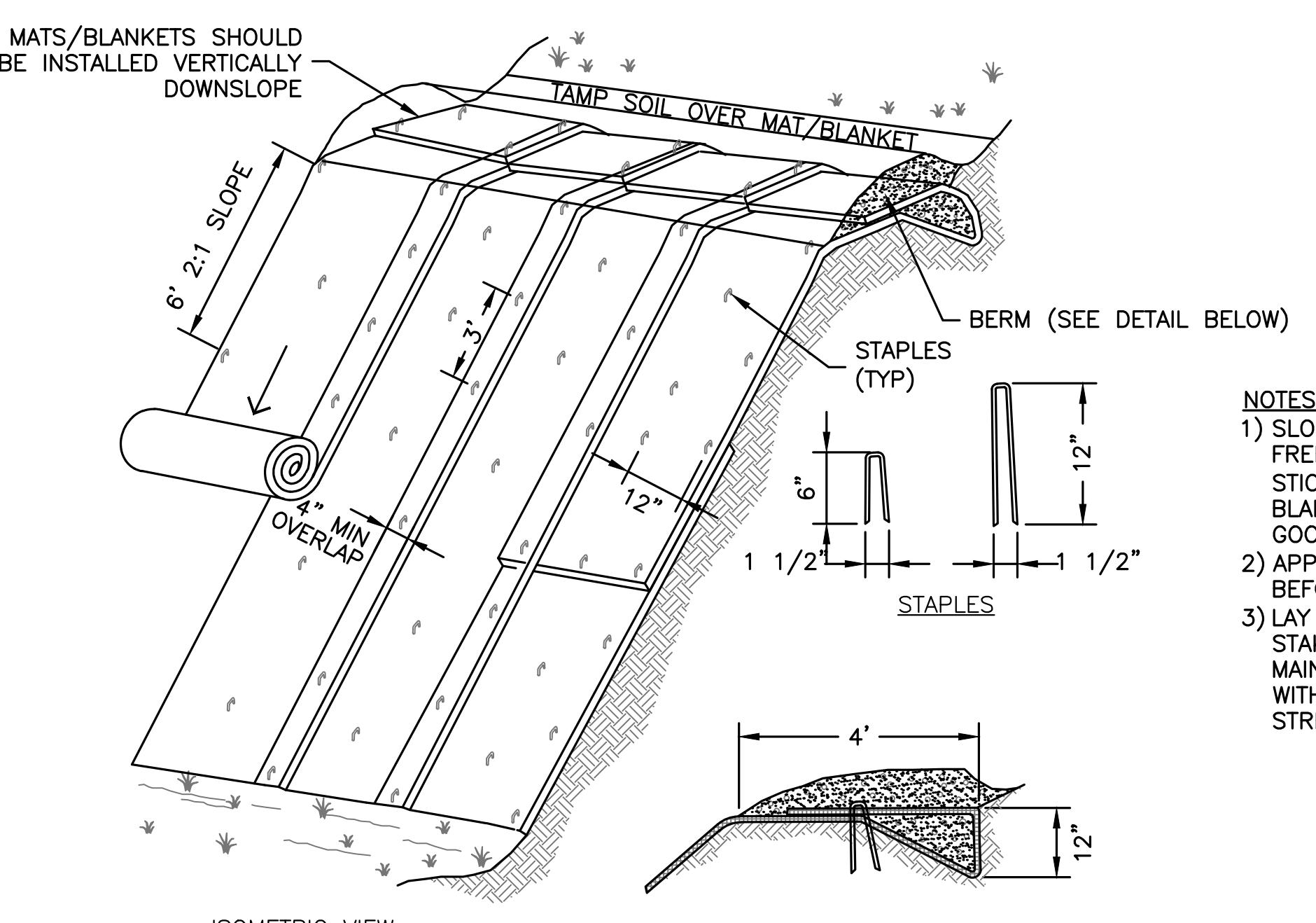
PREPARED FOR:
KNOX TRAIL COUNCIL
BOY SCOUTS OF AMERICA
490 UNION AVENUE
FRAMINGHAM, MA 01702

NOBSCOT SCOUT RESERVATION TRAIL PROJECT FRAMINGHAM AND SUDSBURY, MA WORCESTER COUNTY

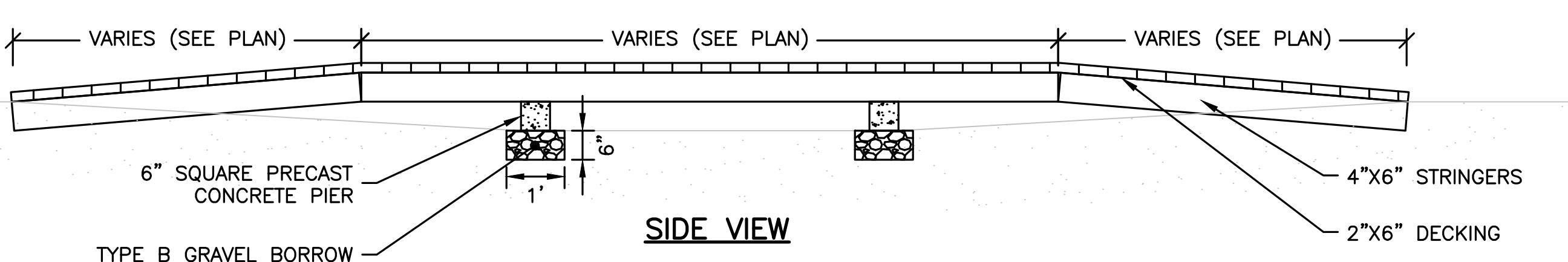
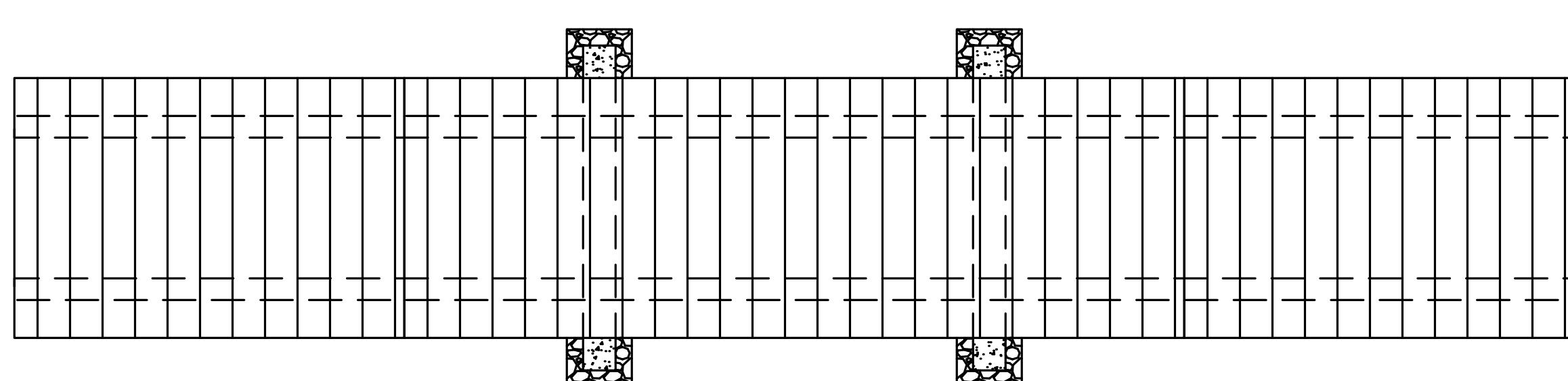


- NOTE:**
1. THE PLYWOOD BARRIER WILL BE REMOVED DURING THE CONSTRUCTION DAY AND REPLACED EACH EVENING OR AT THE END OF THE WORK DAY.
 2. EACH SECTION OF PLYWOOD BARRIER SHALL OVERLAP THE ADJACENT SECTION TO ENSURE THAT ALL OPENINGS ARE BLOCKED COMPLETELY.

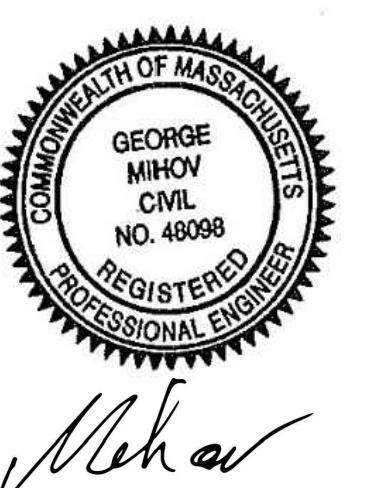
TURTLE BARRIER ENTRANCE DETAIL
NOT TO SCALE



- NOTES:**
- 1) SLOPE SURFACE SHALL BE FREE OF ROCKS, CLODS, STICKS AND GRASS. MATS/BLANKETS SHALL HAVE GOOD SOIL CONTACT.
 - 2) APPLY PERMANENT SEEDING BEFORE PLACING BLANKETS.
 - 3) LAY BLANKETS LOOSELY AND STAKE OR STAPLE TO MAINTAIN DIRECT CONTACT WITH THE SOIL. DO NOT STRETCH.



BOG BRIDGE DETAIL
NOT TO SCALE



NOTICE OF INTENT PERMIT SET

DETAILS

DATE:	10/24/2022
PROJECT NUMBER:	16033.02
DESIGNED BY:	JBC
DRAWN BY:	JBC
CHECKED BY:	REL



October 27, 2022

Mr. Adam L. Duchesneau, AICP
Director Planning and Community Development
Town of Sudbury
278 Old Sudbury Road
Sudbury, Massachusetts 01776

Ref: Second Peer Review of Stormwater Management Permit Application
Nobscot Scout Reservation Trail Improvement Project
1 Nobscot Road, Sudbury, MA

Dear Mr. Duchesneau and Board Members:

The Horsley Witten Group, Inc. (HW) is pleased to submit this second review letter to the Town of Sudbury regarding the stormwater management and erosion control measures proposed for the trail improvement project throughout the Nobscot Scout Reservation. The project is located on a 250-acre parcel with an anticipated area of disturbance being 54,391 square feet (sf). The Mayflower Council Boy Scouts of America (Applicant) has applied for a stormwater permit that includes several locations of trail improvements, primarily adding stone or replacing boardwalks within an existing trail network. The Applicant is not proposing to widen the existing trails, currently between 8-feet and 11-feet wide. In 2020 some maintenance was attempted that created an erosion problem along a few of the trails. The Applicant has included erosion control measures as well as some areas of stormwater management to repair the previously altered trails and slow the velocity of the runoff prior to flowing into adjacent wetlands.

The following documents and plans, were received by HW:

- Letter to The Planning and Community Development Department, regarding Nobscot Scout Reservation Trail Improvements Project, prepared by Howard Stein Hudson, dated October 24, 2022 (10 pages); and
- Site Plan for Nobscot Scout Reservation Trail Project, Sudbury and Framingham, MA, prepared by Howard Stein Hudson, dated October 24, 2022 (22 sheets).

As part as our review HW conducted a site visit with the Applicant's team and members of the Sudbury Conservation Commission on September 9, 2022. To simplify our review HW has provided comments on the proposed trail improvements project referencing the sheet number of the Site Plan set.

The following comments correlate with our initial peer review letter dated October 11, 2022, follow up comments are provided in bold font and dated October 27, 2022.

Sheet 1 of 21: Cover Sheet (no comments)

Sheet 2 of 21: Key Plan (no comments)

Sheet 3 of 21: Legion Cabin and Gen John Nixon Trail station 112+00 to 118+00.

- Applicant proposed to remove 12 inches of soil build up for 20 feet on north, south and west side of Legion Cabin. Applicant should grade newly disturbed area away from building.

October 27, 2022: The Applicant has provided additional spot grades in this area as well as intended slopes. HW has no further comment.

- HW understands basement is wet. Drip edge proposed for roof runoff, if feasible consider adding perforated pipe to pull roof runoff further away from building. Where grass is removed replace with mulch to the extent feasible.

October 27, 2022: The Applicant has included a perforated 4-inch PVC pipe within the drip edge which daylights on the south side of the cabin with a riprap apron. It has also incorporated mulch in areas where grass is removed. HW has no further comment.

- Area noted to remove rocks and regraded adjacent to Station 114+50 may not be necessary if for aesthetics only. Once remove vegetation in this area invasives could become a problem.

October 27, 2022: The Applicant has removed this area from the project. HW has no further comment.

- Review use of firewood in Conservation Restriction, may be okay to use down trees but this should not be considered an automatic approval.

October 27, 2022: The Applicant has clarified the use of downed trees for firewood. HW does not have a copy of the Conservation Restriction to confirm the proposed use. HW defers further discussion to the Conservation Commission.

- Culvert northeast of cabin at Station 112+00 should be cleaned out when working in this area. Proposed fill should not extend into wetlands but remain on path.

October 27, 2022: The Applicant has added a callout in this area to clarify the cleaning of this culvert area during construction. It has noted that there will be no encroachment on wetlands in this area. HW has no further comment.

- Rocks at high point of Gen John Nixon Trail around Station 115+50 have been removed causing some erosion. Slope on north side of trail could become unstable. Consider means to support slope during Phase 1 improvements. This may require heavy equipment and not be feasible for volunteers to do by hand.

October 27, 2022: The Applicant has noted on the plans the proposed installation of a 45-foot stone wall A detail has been added to Sheet 3. Disturbed areas will also be stabilized with loam and seed. HW has no further comment.



Section of Gen John Nixon Trail to be stabilized. Photo taken 9/9/22.

Sheet 4 of 21: White Ridge Trail station 119+00 to 125+00.

- Work to be conducted in Phase 1 of trail improvements. Consider adding 3 to 4 water bars between Stations 121+25 and 123+50 to direct runoff towards the east.

October 27, 2022: The Applicant has added additional water bars within this area. HW has no further comment.

- Excessive sediment on trail to be removed.

October 27, 2022: HW comment stands, however we understand from our site visit that this is the intent.

- Significant washout visible in wetland series M1-M12. Resource area is larger than noted on plan and sediment traveled a good distance. Should remove sediment by hand.

- **October 27, 2022: The Applicant has added a note to Sheet 4 stating that the sediment within the wetland will be removed by hand following installation of the erosion controls. HW has no further comment.**

- Drainage Swale-2 at Station 123+00 does not appear to be needed. Allow area to revegetate.

October 27, 2022: The Applicant has noted on the plan that this small swale will be filled with loam and hydroseeded immediately. HW has no further comment.

- Concern with invasives within swales after land disturbance. Hydroseed immediately and monitor.

October 27, 2022: The Applicant has indicated hydroseeding has been included as part of the stabilization plan. It also noted all graded areas will be monitored for invasives. The Conservation Commission may choose to include this as a Special Condition.

- During site walk discussed closing trail adjacent to wetland series M1-M12 temporarily while addressing erosion issues at this intersection.

October 27, 2022: It is HW's understanding that the temporary trail closure occurred. HW has no further comment.

- Level spreader may be needed around Station 124+25 to slow flow and reduce erosion.
- **October 27, 2022: The Applicant has stated that a level spreader has been added. However, it is not called out on the plan. HW recommends that the Applicant call out the level spreader and provide a detail.**
- Crushed stone bed may be needed between Station 124+50 and 125+00.

October 27, 2022: The Applicant has added crushed stone between station 124+50 and 125+00 as suggested. HW has no further comment.

- Applicant to review all areas of land disturbance. Areas where grades are changing, and swales created in uplands should be considered a permanent impact and not temporary.

October 27, 2022: The Applicant has noted that work within trails is considered temporary and acknowledged areas of swales to be permanent. This has been reflected in the plans and associated tables. HW has no further comment.



Section of White Ridge Trail that needs sediment removal. Photo taken 9/9/22.

Sheet 5 of 21: Madison Trail Station 400+00 to 407+00.

- HW recommends installing water bars along trail with professional oversight.

October 27, 2022: The Applicant added additional water bars to the area. The Conservation Commission may choose to require professional oversight wherever water bars, check dams, or level spreaders are proposed.

- Crushed stone to be super elevated on southern edge.

October 27, 2022: The Applicant has added a note to ensure the cross slope of the trail has a minimum pitch of 1.5%. HW has no further comment.

- Sediment in path around Station 403+75 should be removed and replaced with stone. Document where sediment that will be removed will be placed temporarily and permanently.

October 27, 2022: The Applicant has stated that sediment removed from the area will be moved off-site to a maintenance facility. It has also stated that any stockpiled areas will be located outside the wetlands and buffer areas. The Conservation Commission may choose to include restrictions to the location of stockpiles as a Special Condition. It may be useful to have the restrictions included on the cover sheet.

- Washout visible around Station 404+50 should be removed by hand.

October 27, 2022: The Applicant has noted the washout to be removed by hand. HW has no further comment.

- Crushed stone should be extended to approximately Station 404+60 at larger boulder.

October 27, 2022: The Applicant has extended the area of disturbance and crushed stone placement to 404+57. HW has no further comment.

Sheet 6 of 21: Monsoon Trail Station 408+00 to 418+00

- Recommend adding water bars between Station 411+00 and 412+00

October 27, 2022: The Applicant has added an additional water bar in this area. HW has no further comment.

Sheet 7 of 21: Ellis Land Trail in Framingham (no comments)

Sheet 8 of 21: Legion Trail Station 1+00 to 8+00

- Placement of 6-foot-long concrete footings for wooden platform at Station 1+00 to be done by hand. Other footing types instead of heavy concrete footings may be considered.

October 27, 2022: The Applicant has noted that this area may be in water for extended periods and considered concrete may be the most practical. It has noted all work in this area to be completed by hand. The Commission may choose to include as a Special Condition that the work is to be conducted by hand or it may prefer that the Applicant add a note to the plan.

- Applicant to review all areas of land disturbance. Areas within wetlands receiving stone should be considered a permanent impact and not temporary.

October 27, 2022: The Applicant has noted that areas of compacted paths being restored with stone within wetland areas are previously impacted and should not be considered temporary. Furthermore, it states areas within wetlands with stone cover would not require replication as there is no wetland loss at this location due to an existing trail. It is HW's opinion that any wetland area receiving crushed stone should be considered a permanent impact. The wetland areas where crushed stone exists and is being replaced may be considered temporary impacts.

- Erosion controls within wetlands should not include trenching of silt fence. Okay to weigh down with silt sock. Measures to be taken to protect turtles during construction.

October 27, 2022: The Applicant has revised the silt fence details to eliminate trenching and replace with filter tubing staked as needed. A turtle entrance barrier has been added to the Details Sheet. HW has no further comment.

- Applicant can get vehicles to largest bridge replacement between Station 7+00 and 8+00. Plan to widen this bridge.

October 27, 2022: The Applicant has stated the intent to widen this bridge for lawn mowers or ATVs to cross but not street vehicles. HW has no further comment.

- Additional comments are listed under Sheet 20 of 21.

October 27, 2022: See responses under Sheet 20 of 21.

Sheet 9 of 21: Muskie Trail Station 9+00 to 15+00

- HW believes trail mislabeled on plan and should be Legion Trail not Muskie Trail.

October 27, 2022: The Applicant has revised the trail label. HW has no further comment.

- Applicant to review all areas of land disturbance. Areas within wetlands receiving stone should be considered a permanent impact and not temporary. Culvert crossing is permanent impact.

October 27, 2022: The Applicant agrees that the proposed culvert crossing is a permanent impact. However, it has noted that areas of compacted paths being restored with stone within wetland areas are previously impacted and should not be considered temporary. It is HW's opinion that any wetland area receiving crushed stone should be considered a permanent impact. HW agrees that the placement of the crushed stone is beneficial to avoid widening of the trail from pedestrian traffic. However, we still consider it a permanent impact.

- Invasive species in this area are a concern, including poison ivy, specifically north side of trail for 25 feet beyond proposed grading, south side is also a problem but not as severe. Invasive management plan should be reviewed with Conservation Commission. Replant disturbed area with shrubs and spray seed mix. Weed Warrior program was discussed. Applicant should explain how it intends to restore the temporary impacts to the wetlands in this area.

October 27, 2022: The Applicant has stated temporary impacts are to be loamed and hydroseeded with a wetland seed mix. Upland areas will be hydroseeded. It also noted the goal for volunteers to be trained to identify invasives. The Conservation Commission may choose to include management of invasives along the trail as a Special Condition.

- There is a trail to the Peabody Camp site. Questions were raised during site walk on how this trail is accessed by the campers with special needs.

October 27, 2022: The Applicant has stated that the trail system is not ADA accessible and groups with special needs will need to coordinate access with Mayflower Council's Camping and Program Director. HW defers further discussion to the Conservation Commission.

- Work around latrine includes stone trench. Should be placed at roof drip line and not adjacent to building.

October 27, 2022: The Applicant has revised the building footprints per measurements taken in the field and revised locations of drip lines around the buildings. HW has no further comment.

- Work around Webelos Woods Cabin 5 includes excavating large rocks. Recommend leaving rocks as it appears difficult to remove them by hand and the need to remove is not obvious. Recommend adding a stone trench at drip line west side of cabin.

October 27, 2022: The Applicant has eliminated the stone removal callout and has added a stone drip edge to the west side of the cabin. HW has no further comment.



Invasive species along trail and large rocks at Cabin 5. Photo taken 9/9/22.

Sheet 10 of 21: Little Sachem Brook Bridge. Legion Trail station 16+00 to 17+00

- Bridge replacement to be included in Phase 1 improvements. Bridge will be built onsite.
- **October 27, 2022: The Applicant has stated that replace of the bridges will occur during the Phase III improvements and are not included in Phase 1. HW has no further comment.**
- Concrete footings may be difficult to carry to this location. Applicant may want to consider helical piles.

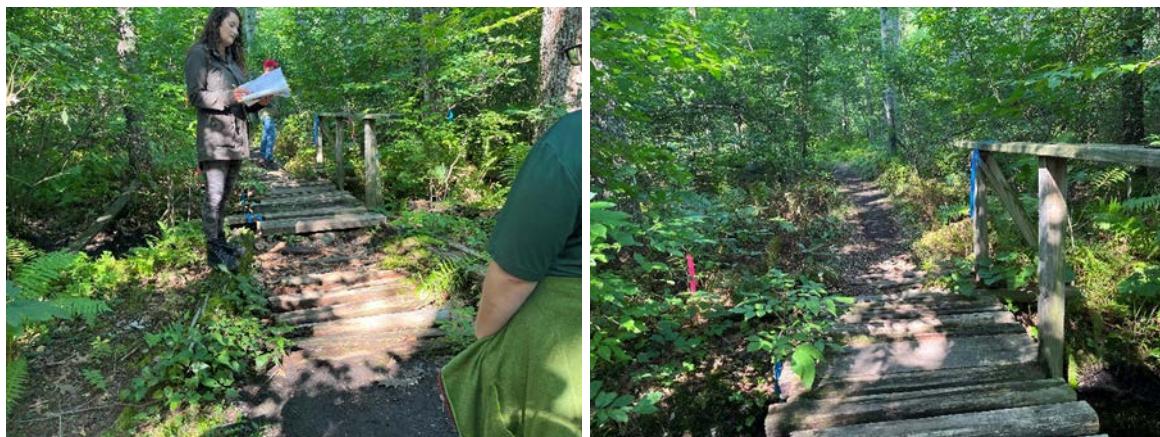
- **October 27, 2022: The Applicant has considered helical piles but were dismissed due to soil type, depth, and equipment at location. HW has no further comment.**

When calculating disturbance consider footings permanent disturbance while bridge is temporary disturbance.

October 27, 2022: The Applicant has added these impacts to the impact table. HW has no further comment.

- Keep utility pole acting as headwall.
- **October 27, 2022: The Applicant has stated that the utility pole will need to be removed for installation of the bridge footing and joints. It is not clear on the plans where the utility pole is located and whether it will be replaced. HW recommends that the Applicant provide clarification.**
- Extend bog bridge or add stone for another 8 feet around station 16+75.

October 27, 2022: The Applicant has added additional 8-foot section of platform to the plans and bridge detail. HW has no further comment.



Little Sachem Brook Bridge to be replaced. Photo taken 9/9/22.

Sheet 11 – 13 of 21: Jethro Trail in Framingham (no comments)

Sheet 14 of 21: Ellis Land Trail in Framingham (no comments)

Sheet 15 of 21: Thirty Rod Trail station 100+00 to 110+00 (no comments)

Sheet 16 – 18 of 21: Gen John Nixon Trail station 200+00 to 226+00

- Applicant to review all areas of land disturbance. Areas within wetlands receiving stone should be considered a permanent impact and not temporary.

October 27, 2022: The Applicant has noted that areas of compacted paths being restored with stone within wetland areas are previously impacted and should not be considered temporary. It is HW's opinion that any wetland area receiving crushed stone should be considered a permanent impact. HW agrees that the

placement of the crushed stone is beneficial to avoid widening of the trail from pedestrian traffic. However, we still consider it a permanent impact.

Sheet 19 of 21: Ghost Trail and NIPMUC Trail (no comments)

Sheet 20 of 21: NIPMUC Trail station 314+00 to 319+00 and Belden Bridge

- Applicant intends to remove utility pole and fill void left by pole with precast concrete footing.

October 27, 2022: The Applicant has confirmed this. HW has no further comment.

- Area that appears to be used by dogs to access stream should be planted with native vegetation that will discourage access. Within or adjacent to proposed wetland mitigation area.

October 27, 2022: The Applicant has stated this may not be a deterrent enough to stop dogs from entering the stream and suggests signage. HW agrees signage would be helpful for leashing dogs. HW still recommends plantings as a physical barrier to the stream area. HW defers to the Commission on any conditions implemented for this location.



Utility pole footing to be replaced and wetland mitigation area. Photo taken 9/9/22.

Sheet 21 of 21: Details

- Stone proposed to be placed on paths should be $\frac{3}{4}$ inch to $1\frac{1}{2}$ inch crushed stone.

October 27, 2022: The Applicant has revised its detail for the trail system. HW has no further comment.

Stone to be used in check dams should be a minimum of 3 inches.

October 27, 2022: The Applicant has revised the check dam detail to specify 3-inch stone minimum. HW has no further comment.

- On Water Bar Section detail add depth of lip.

October 27, 2022: The Applicant has revised its Water Bar detail to specify a 2-inch lip for the exposed upstream facing portion. HW has no further comment.

- Add silt fence detail with weighted silt sock.

October 27, 2022: The Applicant has revised the silt fence detail to include a staked compost filter tube instead of a trench. HW has no further comment.

HW recommends that the Conservation Commission review these comments with the Applicant and that the final plan set address the items discussed. HW recommends that the Applicant verify all land disturbance noted for accuracy. HW discussed these comments and suggestions with the Applicant's team on September 9, 2022 during the site walk. Please do not hesitate to contact me at 857-263-8193 or at jbernardo@horsleywitten.com with any comments or questions.

Sincerely,

Horsley Witten Group, Inc.



Janet Carter Bernardo, P.E.
Associate Principal

CC: Sudbury Conservation Commission