

AUGUST 29, 2024

www.bscgroup.com

Andover Conservation Commission
36 Bartlett Street
Andover, MA 01810

**RE: MASSDEP File #090-1428, Haggetts Pond Rail Trail Project
0,051R & 52 Haggetts Pond Road, Andover, MA**

Dear Commissioners,

BSC Group, Inc. ("BSC") is providing this response to the Third Peer Review Comments dated August 23, 2024 from Ann M. Marton, LEC Environmental Consultants, for improvements to the Haggetts Pond Rail Trail project and associated parking improvements, MassDEP # 090-1428. The proposed revised documents are a result from the following:

July 22, 2024 Response to Peer Review Report

- 1) Page 2 Haggetts Pond Rail Trail, Page 13, Response 13, Page 16 & Response 17, bullet 4: These responses discuss the proposed 4-inch minimum gravel base for the rail trail or slightly raising the trail to protect tree roots.**

Clarify and provide further detail regarding the increased depth of gravel base over exposed roots and clarify how much gravel base will be added to the minimum 4-inch gravel trail base when exposed roots are encountered. Feel free to provide profile excerpts or graphics to further clarify the depth of gravel based over exposed roots compared to the minimum gravel based for the rest of the trail.

Review the site plans to ensure that this increased cover over exposed roots is clear on the plans and plan notes and if present, include this in your response. If not present, please add and reference the revised plan sheets in your response.

The project proposes a minimum of 4-inches of compacted gravel base over the existing trail and over existing exposed surface tree roots within the rail trail. For clarification, the HOT MIX ASPHALT RAIL TRAIL SECTION detail on Sheet C-301 has been revised to require 4" Minimum cover of compacted gravel borrow base over all exposed surface roots within paving limits. Additionally, the ROOT ZONE PROTECTIONS detail on Sheet L-301 has been revised to call out the required 4-inches of compacted gravel base over all exposed surface roots within the trail limits.

- 2) Top of Page 29: First sentence states: "If tree roots must be cut, no more than 25% of roots will be cut and individual clean pruning methods (as opposed to linear excavation) will be used."**

Clarify what is meant by "individual clean pruning methods (as opposed to linear excavation)" and ensure this requirement is included on any details and Plan Sheet 301.

Where roots must be cut, they may not be linearly excavated. Individual roots must be identified, cleanly cut and dressed per isa guide (bmp - root management current edition). And meet or exceed ANSI a300. Root pruning shall be done with clean sharp tools and in such a way that does not pull on the roots but leaves smooth cuts. Once exposed, roots must be covered with burlap and kept moist. Root pruning shall be done under the supervision of an isa certified arborist,

This note has been added to the ROOT BARRIER DETAIL on sheet L-301.

3) Page 32 Ecofriendly, Non-Toxic Deck Sealant.

Biosealcoat is referenced in the text as an example. Both the Site Plans and the O&M Plan should reference use of "Biosealcoat, equivalent or better" for sealing and resealing the deck.

Prior to application, the deck Sealant must be approved by the Water Department. This requirement should be added to the Site Plans. If Biosealcoat is not approved by the Water Department, the approved sealcoat should be added to an updated O&M Plan, and the updated O&M Plan should be provided to the Commission for the project file. Use of any equivalent or better sealcoat in the future also must be approved by the Water Department, and if approved, the approved sealcoat should be added to an updated O&M Plan, and the updated O&M Plan should be provided to the Commission for the project file.

Biosealcoat is for future pavement sealing. Garden-Seal, Seal It Green Xtreme Marine, Deck Armor-Total Wood Protection by Seal It Green have been added as examples of environmentally friendly wood sealants to the Operations and Maintenance Plan. Additionally, the BOARDWALK detail notes have been updated to include this requirement on Sheet C-302.

NHESP Conditional No-Take Determination

4) The NHESP Conditional No-Take Determination references review of an April 2024 O&M Plan.

The O&M Plan provide to the Commission is dated July 2024. Update the O&M Plan as requested in this memorandum, add a new date and provide it to NHESP for their review and acceptance. NHESP approval will be required prior to close of the Public Hearing and issuance of an Order of Conditions.

BSC has updated the O&M Plan per the comments received here in, and have forwarded to NHESP for review and acceptance.

Operation & Maintenance Plan

5) Add page numbers to this document.

Page numbers have been added as requested.

6) Trail Edge (page 2): Add the following to the last sentence of the paragraph: "after October 15th.

We have added "after October 15th and before April 15th".

7) Pavement (page 3): The O&M Plan requires use of an "environmentally friendly sealant" but no example of such sealant is referenced. Update the O&M Plan to clarify this statement and add a referenced environmentally friendly sealant. If none exists, state so.

Also add that such environmentally friendly sealant must be approved by the Water Department, added to an updated O&M Plan, and provided to the Commission for the project file.

An environmentally friendly sealant example has been added as requested, Biosealcoat.

8) Boardwalk (page 3): The O&M Plan requires use of a "non-toxic EPA approved formula," but no example of such sealant is referenced. However the July 22, 2024 Response to Peer Review Report references Biosealcoat as an example.

See above comment #3.

Biorsealcoat is for the pavement sealing example product. Garden-Seal, Seal It Green Xtreme Marine, Deck Armor-Total Wood Protection by Seal It Green have been added as examples of environmentally friendly sealants for the boardwalk.

Site Plans

9) Label each wetland on the plans as a BVW or IVW.

Plans have been updated to label wetlands BVW or IVW

10) Sheet L-100: No cultivars. Only native plantings.

Cultivars removed from plant list. These include changing the following on Sheet L-100 and L-101.

11) Sheet L-101: No cultivars. Only native plantings.

Confirm the seed mix titles above each seed mix table are the correct titles for ordering such seed mixes and reference the source of each seed mix (e.g. New England Wetland Plants) Feel free to add "or equivalent" after the seed mix title. Make sure all other seed mix references on the plan set are accurate.

Add more shrubs at the locations shaded below in green and update the total shrub planting count on the site Plans.

Seeding Mixes have been reviewed and the titles updated per the comment above on Sheet L-100.

We look forward to discussing these changes. If you have any questions regarding the enclosed information, please contact me at 617-896-4347, or at dbiancavilla@bscgroup.com.

Sincerely,

BSC Group, Inc.



David Biancavilla, P.E.

Vice President - Engineering Services