



April 25th, 2022

Boston Conservation Commission
City Hall Plaza, Room 709
Boston, MA 02201

Re: IBEW LOCAL 103 Wetland and Buffer Restoration Plan Updates

Dear Commissioners:

Howard Stein Hudson (HSH) is providing this letter update to address comments provided by Conservation Commission Staff in relation to the wetland restoration at the IBEW 103 SITE LOCATED AT 256 Freeport Street, Boston, MA. Also attached is an updated wetland impacts plan and the wetland restoration plan.

Comment No.1: *Table 1-1 details the calculated impacts to the wetland resources but only quantifies the amount of fill placed within the ILSF. Having been to the site, a substantial amount of fill has also been placed within the IVW and Buff Zone. Why has that not been quantified?*

Response: HSH has quantified the fill within the IVW & the 100-Foot Buffer Zone. An updated table is provided below. An updated wetland impact plan is also attached.

AREA	SQUARE FEET	CUT (CY)	FILL (CY)
ISOLATED VEGATED WETLAND	1,924	-	10
ISOLATED LAND SUBJECT TO FLOODING	4,929	14	108
100FT WETLAND BUFFER	24,611	311	601

Table 1-1 Resource Area Impacts (Revised 4.25.2022)

Comment No.2: *The plan itself seems to question the overall survivability of the restoration plantings, especially with the strong presence of invasive species. Why does the plan not include treatment of the invasive species and or restoration of these areas as well?*

Response: Implementing an invasive plant removal plan across the entire site is a massive undertaking and out of the scope of the enforcement order. In the plan we state that the restoration areas will be monitored for invasives and a treatment will be prepared at that time.



Comment No.3: *Staff feels that this plan is a good first draft but has noted several components that are missing but overall critical to the success of a restoration effort, A clear understanding of what the overall goals and what the intended end point of the restoration plan is critical in assessing the success of the plan and whether the Resource Area Values have been restored.*

Response: The goal of the plan is to restore the pre-existing topography and flood storage capacity of the resource area, and to provide an enhanced and more diverse vegetative community than what existed prior to the unpermitted alteration.

Comment No.4: *Since we are already in April, a detailed timeline of the fill removal and planting process is necessary to ensure that activities are occurring in the correct sequence and during the correct time of year.*

Response: The removal of fill will begin in June, 2022. Once the fill is removed the area will be prepared for the seed mixes to be placed. The PWS will inspect for invasive species as outlined in the Wetland and Buffer Restoration Plan prepared by Lucas Environmental, LLC dated March 15, 2022. The erosion control measures, and the disturbed areas will be inspected in accordance with the Stormwater Pollution Prevention Plan. It is anticipated that the trees and shrubs will be planted at the appropriate time in late summer/early fall, depending on weather conditions. Plantings will commence under the supervision of the PWS.

Comment No.5: *Additional detail on how the fill will be removed and with what equipment, how the predisturbance substrate will be identified, and what process is in place should the predisturbance substrate not be differentiated from the fill.*

Response: Once the erosion controls are in place and the supervising Professional Wetland Scientist (PWS) is on site the contractor shall use a mid-sized excavator to remove the fill material. The excavator will be positioned outside of the wetland resource areas at all times and will be able to reach all of the filled areas. The fill material will be paced within a 10-wheeler dump truck and removed to the predetermined storage area within the existing parking lot, outside of the wetland resource buffer areas.

The fill material placed with the resource areas consist of roughly graded crushed rock and stone which is fairly easy to identify. The underlining material on the site is the original soil material. Once the PWS visually identifies the underlying native material the use of hand tools will begin to remove the last of the fill material.

Comment No.6: *Additional detail on what will happen to the fill, how it will be managed once removed, where it will be stockpiled and/or disposed of, etc.*



Response: The fill material removed from the resource areas will be stockpiled with the existing parking lot with the appropriate erosion controls (Haybales) in place outside of the wetland buffer areas. Suitable fill will be reused in the construction of the new parking areas. The remainder of the fill material will be trucked off site and disposed of according to State Regulations.

Comment No.6: Additional information on how the plantings will be maintained after planting (including irrigation, weeding, etc.).

Response: The PWS will inspect the planting area at the end of the 2022 growing season for invasive species to determine the presence/extent of invasive/opportunistic species within the planting area. If invasive/opportunistic species are found, a control plan including measures for removal will be developed and submitted to the Conservation Commission for review and approval prior to implementation. The control plan will provide for long-term maintenance activities within the restoration areas and Buffer.

The contractor will be required to maintain adequate moisture for the first growing season following planting to support the plantings (>75% survival is required). Irrigation practices will be likely be necessary for the mitigation areas following planting and seeding.

Once the fill is removed from the impacted areas the seed mixes can be placed. These areas would be irrigated twice a week by the contractor or as needed depending on weather conditions. The shrubs and tree planting will be installed in cooler conditions in early fall and will be watered weekly. The watering schedule is subject to change based on weather conditions.

If you have any questions, please do not hesitate to contact me at 617-797-9190 or jdowning@hshassoc.com.

Sincerely,

James Downing
Manager of Civil Engineering



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PREPARED FOR:

**256 FREEPORT STREET
 BOSTON, MA**

REVISIONS:

NO	BY	DATE	DESCRIPTION

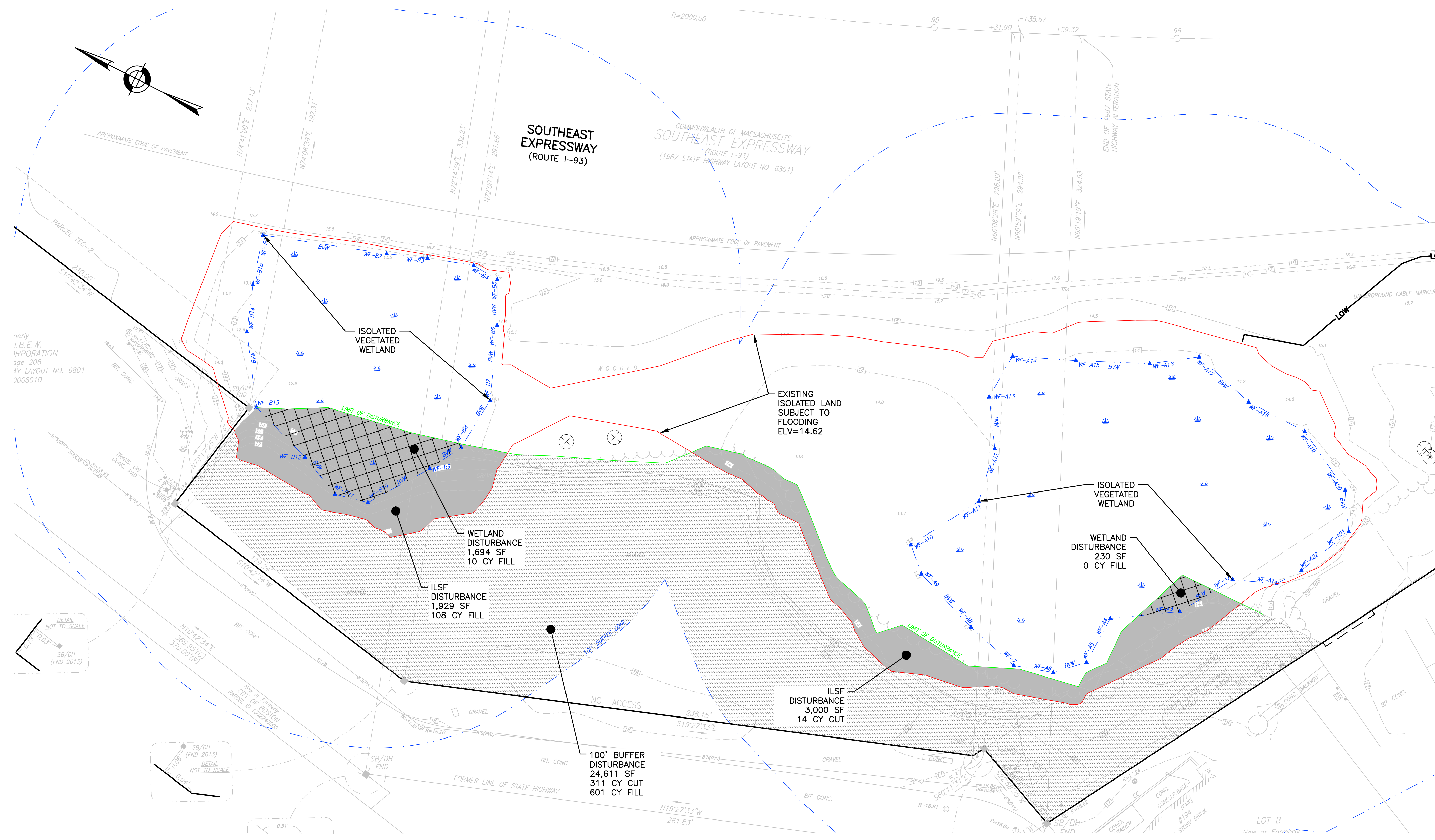


PERMIT SET
 NOT FOR CONSTRUCTION

**WETLAND IMPACT
 PLAN**

DATE: 04/26/22
 PROJECT NUMBER: 19059
 DESIGNED BY: RJM
 DRAWN BY: RJM
 CHECKED BY: JD

FIG-1



DISTURBANCE QUANTITIES				
AREA	SQUARE FEET	CUT (CUBIC YDS)	FILL (CUBIC YDS)	
ISOLATED VEGETATED WETLAND	1,924	-	10	
ISOLATED LAND SUBJECT TO FLOODING	4,929	14	108	
100' WETLAND BUFFER	24,611	311	601	



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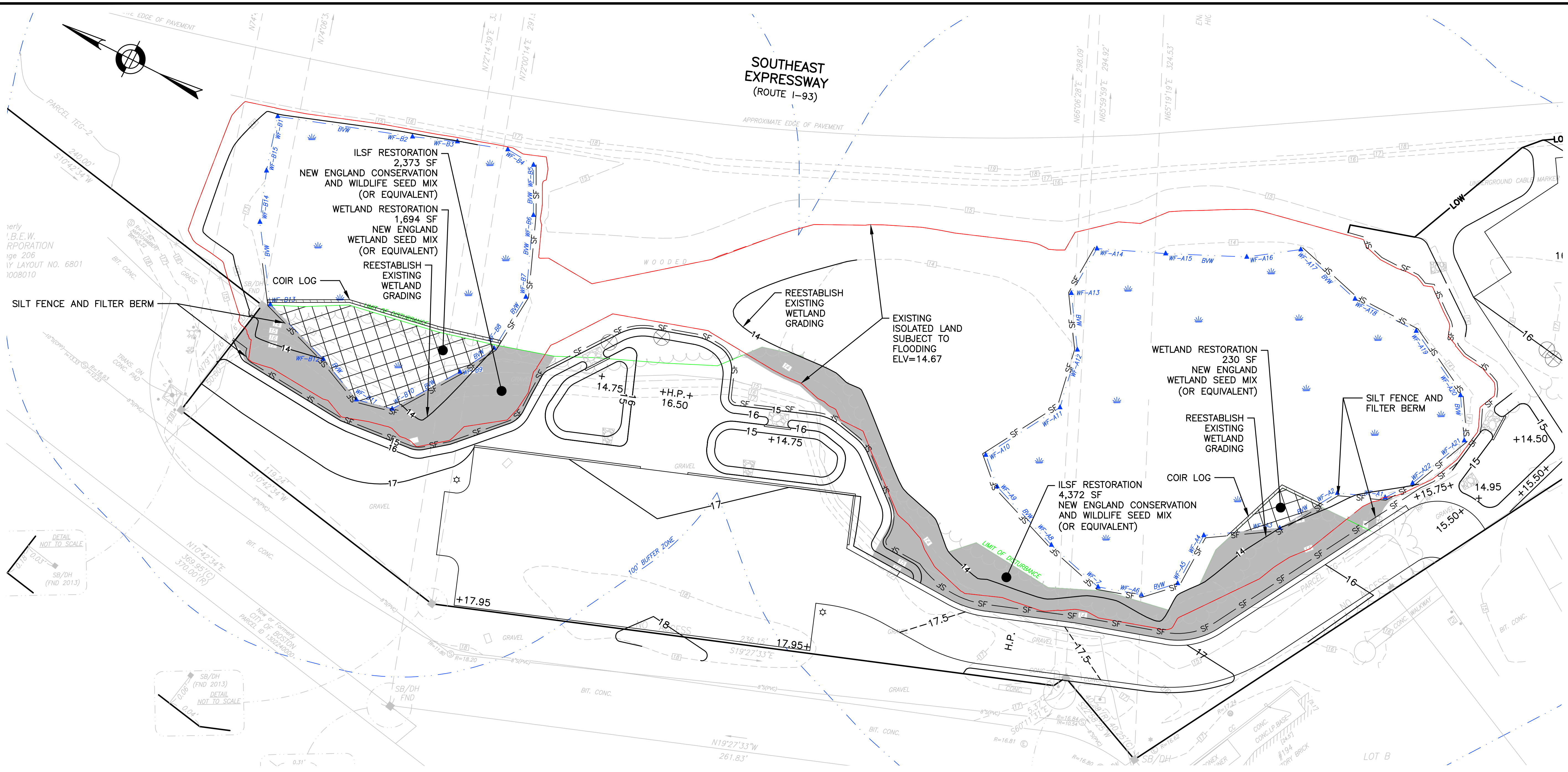


PERMIT SET
 NOT FOR CONSTRUCTION

**WETLAND AND
 BUFFER
 RESTORATION PLAN**

DATE: 04/25/22
 PROJECT NUMBER: 19059
 DESIGNED BY: RJM
 DRAWN BY: RJM
 CHECKED BY: JD

FIG-1



- SEE WETLAND AND BUFFER ZONE RESTORATION REPORT PREPARED BY LUCAS ENVIRONMENTAL, LLC FOR DETAILED INFORMATION ABOUT THIS PLANTING PLAN.
- PROPOSED PARKING AND DRAINAGE IMPROVEMENTS SUBMITTED UNDER SEPARATE NOTICE OF INTENT.
- DURING CONSTRUCTION, PROTECT ALL EXISTING SITE FEATURES, STRUCTURES AND UTILITIES.
- PLANTS SHALL BE TRUE TO SPECIES AND VARIETY SPECIFIED AND NURSERY GROWN IN ACCORDANCE WITH THE AMERICAN STANDARD FOR NURSERY STOCK UNDER CLIMATIC CONDITIONS SIMILAR TO THOSE IN THE LOCALITY OF THE PROJECT. SUBSTITUTIONS WILL BE PERMITTED ONLY IF APPROVED BY THE WETLAND SCIENTIST.
- WETLAND SCIENTIST APPROVAL IS REQUIRED BEFORE PLANT MATERIAL IS PLANTED.
- ALL EXPOSED BURLAP, WIRE BASKETS AND OTHER MATERIALS ATTACHED TO PLANTS SHALL BE REMOVED PRIOR TO PLANTING. CARE SHALL BE TAKEN NOT TO DISTURB THE ROOT BALL OF PLANTS.
- THOROUGHLY WATER ALL PLANTS IMMEDIATELY AFTER PLANTING.
- LOAM USED SHALL BE UNIFORM IN COMPOSITION, FREE FROM SUBSOIL, STONES LARGER THAN 1", NOXIOUS SEEDS AND SUITABLE FOR THE SUPPORT OF VEGETATIVE GROWTH. THE pH VALUE SHALL BE BETWEEN 5.5 AND 6.5.
- MULCH IN TREE AND SHRUB BEDS SHALL BE NATURAL, NATIVE HEMLOCK MULCH FREE OF GROWTH OR GERMINATION INHIBITING INGREDIENTS.
- LOCATIONS FOR PLANTS AND/OR OUTLINE OF AREAS TO BE PLANTED ARE TO BE STAKED OUT AT THE SITE FOR APPROVAL BY THE WETLAND SCIENTIST.

RESTORATION AREA	SQUARE FEET
ISOLATED VEGETATED WETLAND	1,924
ISOLATED LAND SUBJECT TO FLOODING AND BUFFER ZONE	6,745

**TABLE 1
 ISOLATED VEGETATED WETLAND RESTORATION PLAN PLANTING SCHEDULE***

Common Name	Latin Name	Indicator Status	Size	Quantity
Trees				
Green Ash	<i>Fraxinus pensylvanica</i>	FACW	4-6'	10
Pin Oak	<i>Quercus palustris</i>	FACW	4-6'	6
Red Maple	<i>Acer rubrum</i>	FAC	4-6'	6
Total				22
Shrubs				
Speckled Alder	<i>Alnus rugosa</i>	FACW	2-3'	12
Elderberry	<i>Sambucus canadensis</i>	FACW	2-3'	12
Silky Dogwood	<i>Cornus amomum</i>	FACW	2-3'	12
Pussy Willow	<i>Salix discolor</i>	FACW	2-3'	12
Total				48
Ground Cover				
New England Wetland Seed Mix (or equivalent)		Varies	1 lb./7,500 s.f.	1 lb.

**TABLE 2
 ISLF AND BUFFER ZONE RESTORATION PLAN PLANTING SCHEDULE**

Common Name	Latin Name	Size	Quantity
Trees			
Hackberry	<i>Celtis occidentalis</i>	4-6'	6
Red Cedar	<i>Juniperus virginiana</i>	4-6'	10
Chokecherry	<i>Prunus virginiana</i>	4-6'	10
Pin Oak	<i>Quercus palustris</i>	4-6'	8
Gray Birch	<i>Betula populifolia</i>	4-6'	6
Total			40
Shrubs			
Black Chokeberry	<i>Aronia melanocarpa</i>	2-3'	25
Bayberry	<i>Myrica pensylvanica</i>	2-3'	25
Virginia Rose	<i>Rosa virginiana</i>	2-3'	10
Alternate-leaved Dogwood	<i>Cornus alterniflora</i>	2-3'	15
Serviceberry	<i>Amelanchier canadensis</i>	2-3'	25
Total			100
Ground Cover			
New England Conservation/Wildlife Mix, or equivalent		1 lb./7,500 sq. ft.	1.5

**TABLE 3
 NEW ENGLAND CONSERVATION/WILDLIFE MIX**

Latin Name	Species	Indicator Status
<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>	Creeping Red Fescue	FACU
<i>Panicum virginatum</i>	Switch Grass	FAC
<i>Chamaecrista fasciculata</i>	Partridge Pea	FACU
<i>Panicum clandestinum</i>	Deer Tongue	FAC+
<i>Sorghastrum nutans</i>	Indian Grass	UPL
<i>Asclepias syriaca</i>	Common Milkweed	FACU-
<i>Heliopsis helianthoides</i>	Ox Eye Sunflower	UPL
<i>Eupatorium purpureum</i>	Purple Joe Pye Weed	FAC
<i>Euthamia graminifolia</i>	Grass Leaved Goldenrod	FAC
<i>Verbena hastata</i>	Blue Vervain	FACW
<i>Zizia aurea</i>	Golden Alexanders	FAC
<i>Aster umbellatus</i>	Flat Topped/Umbrella Aster	FACW
<i>Solidago juncea</i>	Early Goldenrod	NI

**TABLE 4
 NEW ENGLAND WETMIX (WETLAND SEED MIX)**

Species	Latin Name	Indicator Status
Fox Sedge	<i>Carex vulpinoidea</i>	OBL
Blunt Broom Sedge	<i>Carex scoparia</i>	FACW
Lurid Sedge	<i>Carex lurida</i>	OBL
Hop Sedge	<i>Carex lupulina</i>	OBL
Fowl Bluegrass	<i>Poa palustris</i>	FACW
Beggar Ticks	<i>Bidens frondosa</i>	FACW
Green Bulrush	<i>Scirpus atrovirens</i>	OBL
Swamp Milkweed	<i>Asclepias incarnata</i>	OBL
Fringed Sedge	<i>Carex crinita</i>	OBL
Soft Rush	<i>Juncus effusus</i>	FACW!
Starved/Calico Aster	<i>(Symphyotrichum lateriflorum)</i>	FACW
Blue Flag	<i>Iris versicolor</i>	OBL
American Mannagrass	<i>Glyceria grandis</i>	OBL
Square Stemmed Monkey Flower	<i>Mimulus ringens</i>	OBL
Spotted Joe Pye Weed	<i>Eupatorium maculatum</i>	OBL