



Engineering Division

TOWN OF ARLINGTON
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Date: December 3, 2020
To: Jenny Raitt; Director, Department of Planning and Community Development (DPCD)
Emily Sullivan; Environmental Planner & Conservation Agent, DPCD
From: Wayne Chouinard; Town Engineer
RE: Plan Review for Thorndike Place – Isolated Vegetated Wetland Delineation

The Town of Arlington Engineering Division is in receipt of the information related to the Comprehensive Permit Application for Thorndike Place, provided by the DPCD on Monday, November 23, 2020.

Currently, Engineering Staff are reviewing the site plans and utility information provided with the intent of submitting comments for your consideration as soon as possible. However, a more critical item has been noted which may have broader implications on the site review due to a potential affect on developable space and resource area jurisdiction. The item in question is the confirmation and the subsequent protection of isolated vegetated wetlands (IVW) and whether they should be deemed jurisdictional. The general area of concern is located directly behind the nearby abutting homes on Dorothy Road. Of particular concern is a the area located behind 44-46 Dorothy Road which I believe may be potentially mis-classified in terms of jurisdiction. Upon visiting the site and reviewing the submittal documents the following information and recommendations are provided.

The previously identified potential IVW should receive further evaluation to ensure that they are not a jurisdictional wetland area. Failure to identify this area as a resource area simply due to the lack of wetland vegetation does not adhere strictly with 310CMR10.55; Bordering Vegetated Wetlands (Wet Meadows, Marshes, Swamps and Bogs). Though lacking wetland indicator plants, the area has been disturbed as noted by observable construction debris, concrete, and asphalt in the area. In addition to being considered a disturbed¹ site, the area meets all the criteria for indicators of saturated and inundated conditions, including groundwater, prolonged or frequent flowing or standing surface water, and hydric soil characteristics. This area is more than likely capable to support a predominance of wetlands indicator plants as indicated by observable morphological adaptations and visible hydrological features. However, this may be hindered by the extensive invasive vegetation that is present.

In order to accurately evaluate the area please consider the following:

1. Provide accurate location and flagging of any previous and future test pits and include on plans.
2. Perform a grid of observation test pits in the area to provide more insight into the subsurface hydrology of the area that is less impacted by the undulating topography formed by past disturbances.
3. Consider installing two (2) deep observation test pits in the area with monitor wells to collect data to perform calculations using data suitable USGS monitor well sites to estimate ESHGW elevation.

Thank you for accepting these comments. As previously noted, the Engineering Division will be providing additional site plan review comments in the near future.

¹ 310 CMR 10.55(2)3. Where an area has been disturbed (e.g. by cutting, filling, or cultivation), the boundary is the line within which there are indicators of saturated or inundated conditions sufficient to support a predominance of wetland indicator plants, a predominance of wetland indicator plants, or credible evidence from a competent source that the area supported or would support under undisturbed conditions a predominance of wetland indicator plants prior to the disturbance.