

January 23, 2023

Ryan Clapp
Arlington Conservation Commission
730 Massachusetts Avenue Annex
Arlington, MA 02476

**Re: Notice of Intent Restoration Plan Peer Review
Thorndike Place, Arlington, Massachusetts**

Dear Mr. Clapp and Members of the Commission:

SWCA Environmental Consultants (SWCA) is pleased to submit this peer review letter report for a proposed restoration plan as part of the proposed Thorndike Place Residential Community Notice of Intent (NOI). The subject property occurs along Dorothy Road, Concord Turnpike, and Thorndike Street Extension (Assessors Map 13, Parcel 12-5.A; Map 14, Parcels 2-5 and 2-8; Map 16, Parcels 8-2, 8-3, 8-4, 8-5, 806, 8-7.A, and 8-8; and Map 17, Parcel 5-6.A). This report presents SWCA's review of the NOI documents and includes our findings and comments relative to the proposed project's compliance with the Massachusetts Wetlands Protection Act (M.G.L. c. 30 §131) (WPA) and its implementing regulations (310 CMR 10.00 et seq.) specifically addressing the proposed habitat restoration plan. The project was previously reviewed and approved under a Comprehensive Permit by the Town of Arlington including under the Arlington Wetlands Protection Bylaw (Art. 8) and its implementing regulations (effective March 16, 2023).

This review is provided by a SWCA Certified Wildlife Biologist, Professional Wetland Scientist, and Certified Ecological Restoration Practitioner. At the request of the Arlington Conservation Commission (Commission), this review only includes SWCA's review of the proposed restoration plan, including the planting plan and NOI application documents. A comprehensive review of the NOI application and supporting materials (e.g., stormwater report) was not included in our review.

BSC Group, Inc. (BSC) is representing the Applicant and property owner, Arlington Land Realty, LLC (the Applicant), and provided an NOI application dated September 6, 2023. SWCA completed a site walk with representatives from BSC and the Commission on January 5, 2024.

SWCA is in receipt of the following project-related documents as part of the review:

- "Notice of Intent (NOI), Thorndike Place Residential Community, Dorothy Rd, Arlington, MA" cover letter (dated September 6, 2023)
- "Arlington Land Realty, LLC, Thorndike Place Residential Community, Notice of Intent, Arlington, MA, Town of Arlington Conservation Commission" (dated September 2023)

- “Thorndike Place, Notice of Intent, Dorothy Road, Arlington, Massachusetts” (dated September 6, 2023)
- “Stormwater Report, Thorndike Place, Dorothy Road, Arlington, MA” (dated November 2020, revised August 2021, September 2023)

PROJECT NARRATIVE

Project Activities & Associated Impacts

SWCA Comment 1: Section 3.1.1, second paragraph. The narrative states that dead trees (i.e., snags) that do not provide wildlife habitat will be cut and stumped. Snags provide a wide variety of valuable wildlife habitat functions including shelter and forage opportunities. It is doubtful there are any snags that do not provide any wildlife habitat functions. Additionally, removal of snags does not appear to provide any ecological benefit and stumping of snags within the restoration area would likely result in unnecessary additional impacts (e.g., soil disturbance).

SWCA recommends that this language be revised to indicate that only snags that pose a hazard (e.g., leaning towards the proposed buildings and likely to result in property damage or injury) be removed and that no stumping will occur. SWCA recommends the Commission also consider a condition in the Order of Conditions (OOC), if issued, stating that any snags to be removed shall be approved by the Commission.

SWCA Comment 2: Section 3.1.1, second paragraph. The narrative states that an Invasive Species Management Plan (ISMP) for work within resource areas and their buffer zones shall be developed as required by the Comprehensive Permit. During the site walk on January 5, representatives from BSC indicated that invasive species control would be included as part of the proposed restoration efforts. It is unclear how invasive species would be controlled (e.g., mechanical removal, chemical control, etc.) or what the target species would be.

SWCA recommends the Applicant develop a detailed ISMP to be included as part of the NOI that details what the target invasive species will be, proposed specific control methodologies, a monitoring plan to measure invasive vegetation control success, and performance goals. SWCA recommends the ISMP be reviewed by an expert in invasive species removal as some species (e.g., Japanese knotweed [*Reynoutria japonica*]) can be extremely challenging to effectively control.

SWCA Comment 3: Section 3.1.1. The narrative includes multiple references to refuse that has been dumped on the site over the years. During the site walk on January 5, it was noted that as part of the proposed restoration work, the refuse would be removed as much as practicable.

SWCA recommends the Commission include a condition in the OOC, if issued, that requires all surficial refuse, including discarded clothing, metal, concrete rubble, lumber, plastic, and other similar garbage, to be removed from within the resource areas and their associated buffer zones within the limit of work. SWCA also recommends the Commission indicate that any refuse at the surface and partially buried be removed to a depth of up to 12 inches below ground (e.g., a shopping cart that has become partially buried in the soil).

SWCA Comment 4: Section 3.1.1. The narrative provides a brief discussion of the proposed restoration activities, specifically restoration plantings. However, successful habitat restorations consider a wide variety of considerations, beyond vegetation. More specifically, the wildlife habitat and vegetation

evaluation provided in Attachment G of the NOI identifies numerous wildlife habitat features including large woody debris, snags, hard mast and berry producing forage, rocks and rock piles, and others.

SWCA recommends the restoration plan consider how to improve important wildlife habitat functions within the restoration area and include methods to provide important wildlife habitat features that may be lost due to proposed impacts elsewhere on site.

SWCA Comment 5: Section 3.1.1. The narrative and the wildlife habitat and vegetation evaluation identify numerous native and non-native trees and shrubs within the project limit of work, including the restoration area. However, out of the 17 proposed trees and shrubs to be planted, only two (red maple [*Acer rubrum*] and American hornbeam [*Carpinus carolineana*]) are included on the plant schedule.

SWCA recommends the restoration plan be revised to include species within the restoration area that occur on-site to better represent the diversity and community structure of adjacent habitats. There are numerous trees and shrubs documented in the NOI application materials that would be suitable for the restoration area including American elm (*Ulmus americana*), black cherry (*Prunus serotina*), yellow birch (*Betula allegheniensis*), sweet birch (*Betula lenta*), box elder (*Acer negundo*), silver maple (*Acer saccharinum*), white pine (*Pinus strobus*), sycamore (*Platanus occidentalis*), black willow (*Salix nigra*), and others that are also typically readily available as nursery stock.

SITE PLANS

SWCA Comment 6: Sheet G-101, Planting Notes, Note 11. The site plans indicate that the plant species indicated on the plant list are recommendations only and that final selection of the species shall occur at the time of plant purchase, depending on availability and that the size and quantity shall not change without approval of the Applicant's landscape architect.

SWCA recommends this note be revised to indicate that the proposed planting species, sizes, and quantities may be subject to change based on availability. However, these changes should be approved by the Conservation Commission and should be approved prior to purchase.

SWCA Comment 7: Sheet G-101, Comprehensive Permit Notes, Comment I.5. This comment notes that dumping of woody vegetation, brush, and other debris in a resource area or its associated buffer zone is prohibited.

SWCA notes that an exception to this requirement might be considered for the restoration area as large woody debris, brush piles, and other similar wildlife habitat features provide quality habitat functions and are likely to increase the ecological value of the restored habitats.

SWCA Comment 8: Sheet G-101, Comprehensive Permit Notes, Comment I.25. The site plans note that the survival rate of planted species shall be 80% at the end of the third year and that a corrective action plan must be submitted if the survival rate is less than 80% at the end of the third year.

SWCA recommends the Commission consider requiring a corrective action plan to be developed by the Applicant if the 80% success rate is not met after any year of monitoring. Waiting until the third year of monitoring to develop and implement any corrective actions may unnecessarily prolong reaching the project's performance goals and may result in unnecessary disturbance to the area to rectify any adverse conditions since the restoration area will have had three years to establish.

SWCA Comment 9: Sheet L-100, Plant Schedule. The plant schedule includes a number of proposed cultivars within the 100-foot Buffer Zone (e.g., *Clethra alnifolia* 'ruby spice', *Hydrangea quercifolia*

‘ruby slippers’, and *Hydrangea arborescens* ‘annabelle’). In accordance with condition I.24 of the Comprehensive Permit, all mitigation plantings and plantings within all resource areas shall be native, non-cultivar species. Additionally, other cultivars are proposed in other areas of the site along side non cultivars of native species (e.g., pin oak [*Quercus palustris*] and green pillar pin oak [*Q. palustris* ‘pringreen’]).

SWCA recommends the planting plan be revised to not include any cultivars.

SWCA Comment 10: Sheet L-100. A note on the plans indicates that all dead trees (i.e., snags) that do not provide wildlife habitat per the landscape architect and wildlife ecologist should be removed. Snags provide a wide variety of valuable habitat functions for wildlife including forage for insects, perches to hunt from, shelter if there are cavities or cracks, and other functions.

SWCA recommends this note be revised to indicate that only snags that pose a hazard (e.g., may fall and land on the buildings) may be removed and that removal of any snags must be approved by the Commission.

If you have any questions or comments, please do not hesitate to contact me at either (508) 232-6668 or chase.bernier@swca.com.

Sincerely,



P. Chase Bernier, CWB, PWS, CERP
Senior Natural Resources Team Lead
