



November 10, 2020

Weymouth Conservation Commission
75 Middle Street
Weymouth, MA 02189

Re: Lovell Field Pedestrian Bridge Project
Supplement Letter #1
MassDEP File Number 081-1261
Weymouth, Massachusetts

Members of the Weymouth Conservation Commission:

On behalf of the Town of Weymouth, Lucas Environmental, LLC (LE) is pleased to submit this additional information related to the Notice of Intent (NOI) for the proposed Lovell Field Pedestrian Bridge Project located at Lovell Field in Weymouth, Massachusetts. As you are aware, the Applicant is proposing to construct a pedestrian access bridge over Herring Brook in order to provide access between the Lovell Field and Commercial Street. Portions of proposed work are located within the 25-Foot No Disturb Zone, 100-Foot Buffer Zone to Inland Bank, and the 200-Foot Riverfront Area of Herring Brook. A waiver is requested to clear vegetation within the 25-Foot No Disturb Zone.

Over the course of review of the Notice of Intent application and plans, the Commission has requested some additional information and clarification on the proposed project. As a result, some modifications have been made to the overall design. This letter is intended to summarize the proposed changes as well as provide some additional detail regarding the project and address those comments raised during the October 26th Site Walk, and October 27th Public Hearing.

Proposed Changes

To begin, the overall limit of work has been decreased to limit disturbance to the Riverfront Area. The following summarizes the proposed changes:

- The abutments have been moved landward of the Bank line of the river, which will result in a bridge span of 130 feet instead of 110 feet originally proposed. This will limit disturbance to the earthen embankments along the river.
- The bridge abutments were shifted south to limit tree cutting to a total of four (4) trees between abutments. Limited pruning of several others will be required.
- The limits of work along the proposed pathway have been reduced to limit tree cutting to a total of fourteen (14) six-inch DBH or greater trees. This represents a significant reduction of trees cut from the 50 originally proposed.
- The proposed walkway along the Dunkin Donuts fence was pushed north to leave room for plantings if desired in the future.
- The 12-inch oak tree located along the chain link fence that will be removed in the above described pathway will be replaced with two (2) new two-inch caliper trees, if acceptable.

- The bridge and path have been reduced from eighth (8) feet wide to six (6) feet wide.
- The west side walkway has been changed from a sidewalk to an elevated wooden boardwalk from the existing berm to the bridge abutment. This will provide a clear path across the vegetated buffer zone while preserving the original intent of the buffer zone. This buffer area will also be the location of most of the planting mitigation for the trees being removed.
- The berm along the west side of the river will be modified by two feet only at the location of the elevated boardwalk. This will allow a 24-foot long ramp in lieu of a 48-foot ramp that would be required if the Town kept the walkway at the current height of the berm. This option preserves the intent of the berm as it was originally proposed and meets ADA requirements.
- Lighting will be provided along the bridge and walkway to the MBTA parking lot. The lighting selection will be similar to the lighting used at legion and operated in the same manner. Lights will be dimmed when the field is not in use.
- Any vegetation disturbed within the staging area will be either replaced with new or restored with plantings that have been temporarily moved for the construction. Grass areas will be loamed and reseeded and meadow areas will be replanted with the same mix as previously specified on the Lovell Field project. See attached for a detailed planting list.
- The proposed decking of the bridge will consist of a tongue-in-groove wood material with a four-inch by four-inch kick plate along the outer edge to eliminate that possibility of any migration of field material either through the decking or over the side of that walkway on the bridge.
- Open grid flooring has been proposed for the first four feet of each ramp for players to stomp their shoes and remove any loose pellets. The Town will post signs at each ramp entrance requesting players to stomp their feet prior to going up the ramp to the boardwalk.

Alternatives Analysis

In addition to the above, the Commission requested some additional information related to “*Alternative 3 – the MBTA Stormwater Outfall*” to determine if that is a more suitable location for the proposed crossing structure. This alternative proposes to cross the brook with the same bridge structure; however, is proposed further downstream. This alternative was evaluated but ultimately dismissed for the following reasons:

1. A new sidewalk could traverse the edge of the parking lot but extensive tree removal and earthwork would be required.
2. It may be difficult to grade the area without disturbance into the drainage channel. The grading does not currently meet ADA accessibility requirements.
3. There are not locations at the bottom of the path, along the east side of the river that would be an adequate for the abutment. Constructing an at-level boardwalk from the parking lot to the east side of the river would require an additional 100 feet of elevated boardwalk, totaling approximately 230 feet of new structure.
4. The primary reason this alternative was dismissed was because this location would require additional easements and/or licenses from the MBTA. Also, this alternative would require a significant amount of survey work to redesign the location.

There was also interest to further explore the “*Alternative Location 2 – East Embankment*”. This path utilizes the same approach to the athletic fields but instead includes an existing walking path that runs south along the embankment towards the existing footbridge at the fish ladder. This alternative avoids the need to construct a new bridge over the river, and keeps pedestrians off of Commercial Street. This alternative was ultimately dismissed for the following reasons:

1. This would require significantly more land disturbance along the embankment of the river. An estimated 100 trees would need to be removed and mitigated. The preferred alternative requires a total of 14 trees to be removed.
2. Additional lighting and utilities would be required.
3. A significant amount of additional pervious pavement would be required.
4. There are safety concerns with people congregating behind the businesses along Commercial Street.

Limited Project Status

During the Public Hearing, the Commission expressed concern over whether the project represented the alternative with least adverse effect to the resource area. The proposed project qualifies as a Limited Project. Many limited projects are activities which are important to public health, safety, and the environment. The limited project provisions of 310 CMR 10.53(3) are designed to provide the issuing authority with the discretion to allow certain work to proceed although the work may not meet the performance standards.

These provisions provide the discretion to permit these projects and the authority to impose conditions which, in addition to those set forth in the applicable portion of 310 CMR 10.53(3), the issuing authority determines are necessary to adequately protect the interests of the Wetlands Protection Act, M.G.L. c. 131, s.40. The project meets two of the Limited Project provisions of the WPA listed in 310 CMR 10.00. Limited Projects are required to meet the applicable performance standards of the WPA only to the extent practicable, provided that there are no adverse effects on the habitat of rare species.

The following Limited Project provisions are applicable to this project:

Section 310 CMR 10.53(3)(j): “*The construction and maintenance of catwalks, footbridges, wharves, docks, piers, boathouses, boat shelters, duck blinds, skeet and trap shooting decks and observation decks; provided, however, that such structures are constructed on pilings or posts so as to permit the reasonably unobstructed flowage of water and adequate light to maintain vegetation.*”

The proposed pedestrian bridge will be situated on top of two proposed abutments, approximately ten feet above the Mean High Water (MHW) line of the river, and above the 100-year flood elevation. There will be no obstruction to the flowage of water. The pedestrian bridge is also quite narrow (six feet wide), therefore there are no anticipated lighting impacts to any aquatic vegetation.



Section 310 CMR 10.53(6) Limited Project states: “Notwithstanding the provisions of 310 CMR 10.58, the issuing authority may issue an Order of Conditions for the construction, rehabilitation, and maintenance of footpaths, bikepaths, and other pedestrian or non-motorized vehicle access to or along riverfront areas but outside other resource areas, provided that adverse impacts from the work are minimized and that the design specifications are commensurate with the projected use and are compatible with the character of the riverfront area. Generally, the width of the access shall not exceed ten feet of pavement, except within an area that is already altered (e.g., railroad beds within rights of way). Access shall not be located in vernal pools or fenced in a manner which would impede the movement of wildlife.”

Due to the nature of the project, work in the Riverfront is unavoidable. The proposed construction activities will be located outside of all other resource areas. The impacts have been reduced to the extent practicable and erosion and sedimentation controls are proposed to further reduce the risk of adverse impacts to the adjacent resource area. Therefore the Applicant requests the project be reviewed as a Limited Project and issue an Order of Conditions for the project.

Enclosed please find one (1) original and six (6) copies of the revised Site Plans. We respectfully request that you place this matter on your agenda for the November 17, 2020 Public Hearing.

If you have any questions, please do not hesitate to contact me at 617.405.4053 or tel@lucasevironmental.net. Thank you for your consideration in this matter.

Sincerely,
LUCAS ENVIRONMENTAL, LLC

A handwritten signature in black ink that reads 'Thomas E. Liddy'.

Thomas E. Liddy, PWS, CWS
Environmental Consultant/Soil Scientist

Enclosures Revised Plan Set
 Revised WPA Form 3

cc: Town of Weymouth Planning Department
 MassDEP – SERO