



March 15, 2019

Town of Wrentham
Conservation Commission
79 South Street
Wrentham, MA 02093

**RE: Ledgerview Commercial Billboard Replacement NOI (MassDEP File #351-1127)
Variance Request for Proposed Work within 50-Foot No Work Zone**

Dear Members of the Conservation Commission:

On behalf of the Applicant (Clear Channel Outdoor), Hancock Associates respectfully submits this formal request for the Wrentham Conservation Commission to grant a waiver from the 50-foot No Work Zone as regulated under the Town of Wrentham Wetlands Protection Bylaw, permitting the Applicant to perform limited tree removal within this restricted area in association with a Notice of Intent filed to replace a commercial billboard (MassDEP File #351-1127).

Due to the location of the billboard and the line-of-sight exposure to Washington Street (Route 1), there are no practicable alternatives available to locate this scope of work outside of the 50-foot No Work Zone. This memorandum details this proposed scope of work based on: 1) demonstrated need of the project; 2) existing conditions; 3) efforts to avoid and minimize impacts; 4) protection of the interests of the Massachusetts Wetlands Protection Act and Wrentham Wetlands Bylaw; and 5) public benefit.

Project Need:

The Notice of Intent application was submitted in request to permit the in kind replacement of an existing commercial billboard on an existing concrete pad foundation, with the same dimensions as the existing billboard in terms of height, width, and square footage. Several pioneering early succession trees have grown to a height in which the leaf-cover obstructs the line-of-site exposure to traffic traveling on the northbound lane of Washington Street (Route 1), for which this billboard is intended to be observed. This billboard has been in place in the same location for decades, and the prescribed treatment area proposed for limited tree clearing has been subject to tree clearing and vegetation thinning in the past.

Existing Conditions:

The area proposed for limited tree clearing is located to the south of the billboard along the shoulder of Washington Street (Route 1), on the approach to the Interstate Highway 495 northbound on ramp. Due to heavy traffic volume, this area is degraded with rubbish and accumulation of salts and sediment from the roadway. The substrate of the proposed treatment area is very stony, with very thin and nutrient poor topsoil. Plants growing within this area are xeric soil tolerant and include quaking aspen (*Populus tremuloides*, FACU), eastern red cedar (*Juniperus virginiana*, FACU), Norway maple (*Acer platanoides*, UPL), black locust (*Robinia pseudoacacia*, UPL), and little bluestem (*Schizachyrium scoparium*, FACU).

The wetland resource area is a man-made intermittent stream with riprap armored embankments. There is no associated Bordering Vegetated Wetland (BVW) as the stream transitions immediately into nutrient poor xeric soils types up gradient of the riprap embankments.

Efforts to Avoid, Minimize, and Mitigate:

Due to the fixed location of the trees within the line-of-sight to the billboard, there is no practicable alternative to avoid disturbances within this location for which tree removal is proposed.

In effort to minimize disturbances, the trees specified for removal have been limited to twenty (20) trees which are the tallest and located directly within the line-of-sight corridor to the billboard. This represents a small portion of the woody vegetation within this area, and thinning of the overstory rather than clear cutting. It is important to note, that of the 20 trees proposed for removal, 6 of the trees are invasive species (Norway maple and black locust), and 14 of the trees are smaller than 10-inch diameter at breast height (DBH). Quaking aspen represents the species for which the most trees will be taken. Quaking aspen is a fast growing pioneer species prone to establishment in dry soils following disturbance. These trees have reached heights in excess of 25-feet, while the diameter at breast height is only 6 to 8-inches.

As compensatory mitigation, the Applicant has provided a Tree Removal Restoration Plan which details a native planting plan to replant a total of sixty four (64) native shrubs as replacement for taken trees at a greater than 3:1 ratio than the trees proposed for removal. The plan also details the application of New England Wildlife/Conservation Seed Mix to add vegetative ground cover and increase plant species diversity in providing soil stabilization, additional filtration of salts and sediments, and wildlife habitat value. This represents a conversion of strata from tree overstory to a scrub/shrub cover class, however it is my professional opinion that there

will be no net loss of vegetative cover or ecological integrity in providing wildlife habitat and protection of the interests of wetland resource are interests characterized in the next section.

Protection of Wetland Resource Area Interests:

In accordance with Massachusetts Wetland Protection Act Regulations 310 CMR 10.01(2), the interests for protection of wetland resource areas includes:

- Protection of public and private water supply
- Protection of groundwater supply
- Flood control
- Storm damage prevention
- Prevention of pollution
- Protection of land containing shellfish
- Protection of fisheries
- Protection of wildlife habitat

This section provides detail on how these interests will be protected in the post-alteration condition.

In the existing condition, the site does not provide any functions and values in the protection of *land containing shellfish, fisheries, storm damage prevention, or flood control*. As such, there will be no net change to these interests in the post-alteration condition.

There will be no change in grade, substrate or new impervious surface area, therefore infiltration rates will remain unchanged in protection of *groundwater supply*.

With incorporation of the native planting plan it is anticipated that there will be additional root stock and vegetative cover in providing additional soil stabilization and filtration, which in turn provides a net benefit in *prevention of pollution* and *protection of public and private water supply* through additional filtration and attenuation of road salts and surface pollutants received from the adjacent highway.

The plants and seed mix specified in the native planting plan have been selected specifically to add species diversity, and shrub and ground cover level vegetative cover in providing *protection of wildlife habitat* through nesting habitat, cover and food sources.

It is my professional opinion, that with successful implementation of the restoration plan, there will be a net benefit in protection of the interests for wetland protection in the post-alteration condition.

Public Benefit:

Replacement of the conventional paper billboard with a modern digitized billboard does represent some net benefit to the public. As mitigation, Clear Channel will be providing the Town of Wrentham with \$20,000.00 annually to be used in public services for Wrentham residents. Clear Channel has also agreed to allot no less than 10-hours per month to the Town of Wrentham and 15-hours per month to the Commonwealth of Massachusetts for publicizing state and local events and programs. The digitized billboard also serves additional public safety benefits in the ability to rapidly post emergency announcements, such as Amber Alerts, road closures, and severe weather warnings.

Conclusion

The project has been designed to avoid, minimize, and mitigate for permanent alterations within the 50-foot No Work Zone to the maximum extent practicable. With implementation of the proposed restoration plan to plant native shrubs at a ratio no less than 3:1 for each tree removed, and additional ground cover and diversity provided through application of a native seed mix, it is anticipated that the project will actually result in a net benefit to the interests served in wetland protection.

Please feel free to contact me regarding any questions, comments, or concerns with the information herein. Thank you for your consideration in this matter.

Regards,
Hancock Associates on behalf of Clear Channel Outdoor



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Senior Wetland Scientist / Project Manager

