

**Berkshire Regional Planning Commission
Clearinghouse Review Report**

DRAFT

March 30, 2010

SUBJECT: Housatonic Street Shared-Use Pathway Project
EOEA#: 14561
LOCATION: Housatonic Street and East Street
ESTIMATED COST: \$2.1 Million
REVIEW TYPE: ENF
PROPONENT: Town of Lenox
COMMENTS DUE: April 13, 2010

PROJECT DESCRIPTION:

Existing Conditions:

Housatonic Street and East Street are two-lane, rural roadways lined with residential homes, businesses, Lenox Memorial Middle and High School and a cemetery. There is an existing sidewalk on the west side of East Street. There are two crosswalks at the intersection of East Street and Housatonic Street.

There are multiple wetland areas, an unnamed intermittent stream, and cross culverts along the roadway. Sewer, gas, water, electric, and telephone utilities exist within the project area. The street is lined with trees of varying, size, age, and health.

As per the ENF, the project meets the MEPA thresholds for both ACEC and Transportation. This limited project (310 CMR 10.53f), which is located within the Upper Housatonic Area of Critical Environmental Concern (ACEC). A small amount of bordering vegetated wetlands (1.28 acres) will be impacted.

Project Summary:

The proposed project begins at the north entrance to Lenox Memorial Middle and High School and follows the east side of East Street northerly to the intersection of Housatonic Street and East Street for a distance of approximately 1100 feet. The path then crosses this intersection and follows the north side of Housatonic Street to Willow Creek Road and Crystal Street intersection, approximately 4500 feet.

The total length of the project is approximately 1.06 miles, and includes construction of a 5,600 linear feet full depth, 10' wide path with pavement markings and signage, installation of a crushed stone shoulder at the street edge of pavement, and installation of grass shoulders at the path edge of pavement. Raised boardwalks through wetland areas are proposed in two areas along Housatonic Street, totaling approximately 55 linear feet. Low segmental retaining walls, a mechanically stabilized earth wall, and reinforced concrete walls are also planned by the proponent to minimize disturbances and grading impacts.

The proponent (the Town of Lenox) intends that this shared-use path will become part of the county-wide Berkshire Bikeway.

CONSIDERATIONS AND POTENTIAL ISSUES:

Consistency with Local & Regional Plans: The proposed project is consistent with the Berkshire Bicycling and Walking Plan and the Massachusetts Bicycle Transportation Plan goal of offering citizens and visitors a network of roads, shared use paths and transit facilities that are designed, constructed, and maintain with bicycle use in mind and create a more sustainable transportation system with benefits to transportation, public health, economic development, environmental quality, and tourism and recreation.

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Being a component of the county-wide multi-use trail which is a recommendation in the Regional Transportation Plan (2007), the project is in accordance with that plan. The current Transportation Improvement Program, approved by the Berkshire MPO in August 2009, contains funding for this project which is programmed for construction this fiscal year (before September 30, 2010)

Land: This project will result in approximately 1.28 acres of altered roadway shoulder, creating additional impervious paving, requiring the removal of approximately 60 trees of varying age and condition, and creating altered views for property owners, motorists, bicyclists and pedestrians. At the same time, however, it will facilitate non-motorized travel. At BRPC's request, the project engineer has provided a supplementary list of trees to be removed, including location, species, caliper and quantities. (Some information regarding replacement species and sizes is also provided.) In some cases, removal of these trees will have a marked effect on the quality of views.

Wetlands and Wetland/Aquatic Habitat : This project requires review under MEPA, requires a Local Order of Conditions under the Wetlands Protection Act, 401 Water Quality Certification, Army Corps PGP and US EPA Construction General Permit. Wetland resource areas involved consist of bordering vegetated wetlands, the bank of an unnamed intermittent stream, and the buffer zone. Approximately 20 LF of bank and 4,800 SF of bordering wetlands are included. It is a limited project (310 CMR 10.53f) with no fill or structures in a velocity zone or regulatory floodway, and no discharge to Outstanding Resource Waters.

As described by the proponent, the project does require an order of conditions under the Wetlands Protection Act, however the Proponent states minimal impacts on wetlands, and has included a plan for replicating wetlands in altered areas, including new trees and shrubs, with safeguards to prevent re-population by invasive species. A total of eight (8) wetland replication areas are planned.

General Conditions included in the plan for construction-phase activities address the control of sediment and erosion and the protection of wetlands, including retaining and protecting natural vegetation and vegetative filter strips wherever possible, using silt fences and straw bales along downhill edges of disturbed earthwork areas, and removing trapped sediment at the 50% full level to prevent sediment from being transported downhill. A plan is in place for the disposal of sediment in on-site upland disposal areas, to be properly graded, seeded and mulched. Construction equipment will not be fueled within 100 feet of water courses or wetlands.

Stormwater: The Proponent plans to replace an existing culvert with an open bottom arch culvert per stream crossing standards, and the existing roadside drainage ditches will be improved by this activity, reducing erosion and sedimentation. General Conditions included in the plan for construction-phase activities address the control of sediment and erosion, and the proponent states that the work will improve the condition of existing roadside ditches currently in poor condition and subject to erosion and sedimentation. The proponent states that the stormwater management system is designed to conform to DEP's Stormwater Management Standards to the extent practicable. Accommodation of increased stormwater flow generated as a result of additional 1.28 acres of impervious materials is a consideration not entirely satisfied by the narrative of this ENF, but may be further illuminated by the proponent during the MEPA site visit.

Alternatives Analysis: The proponent outlines 2 alternative routes and configurations that have been considered for the proposed project.

Alternative #1, creating a pathway through the woods from Pine Knoll Road to a location near the intersection of East Street and Walker Street would require removal of a greater amount of vegetation and impact several wetlands. This alternative was deemed to have greater environmental impacts and private property ownership issues than the proposed route.

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Alternative #2, considered a 2004 preliminary plan for a similar route, but a pathway width of only 6' to 8', which was determined to be insufficient for safe two-way bike and pedestrian travel.

Transportation:

- **Connectivity-** The proposed trail links two activity nodes, the Lenox Middle & High Schools and Woods Pond that are not dependent on each other for use, but rather are two important destinations relative to a regional trail system.
- **Traffic Generation-** The pathway is likely to attract recreational cyclists uncomfortable with bicycling within the vehicular travel lanes of a road as well as pedestrians seeking a separated pathway. It is a challenging and desirable segment to construct because it represents the commitment to completing non-motorized corridors within visible areas of the Berkshires.
- **Parking-** The existing trailhead parking lot, located at the southeast corner of the intersection of Crystal and Housatonic Streets, provides parking for westbound-originating trips. The Lenox Middle & High school parking lots provide parking for eastbound-originating trips. Available parking should accommodate recreational users of the trail because it is unlikely they would extensively occupy spaces at the schools during peak periods of use.
- **Intersection Improvements-** The project installs ADA compliant improvements at the intersections of East Street & Morgan Street, East Street & Housatonic Street, and Housatonic Street & Willow Creek Road & Crystal Street. These improvements provide enhancements for users of the trail, regardless of personal physical mobility.
- **Geometrics and Construction-** The project appears consistent with AASHTO guidelines for non-motorized facilities. The 25% design of the project does impact natural features. Note that the project segment requires vertical and horizontal grade changes in order to preserve ADA compliance. Often, the construction impacts of cut-and-fill, soil erosion and sedimentation control, and the installation of retaining walls extend beyond the finished project area, displacing regulated and unregulated natural features. The 75% design landscape plan should mitigate for wetlands disruption and preserve the tree canopy that provides the aesthetic viewshed that makes this corridor attractive to users of all modes of transportation while exemplifying the community character of Lenox.

COMMENTS AND RECOMMENDATIONS:

Due to scheduling requirements, draft comments precede the MEPA site visit during which this project will be explained in further detail by the Proponent and Construction Engineer. Final comments and recommendations are pending the Monday, April 5th, 2010.

This project does not exceed any mandatory EIR thresholds, and BRPC does not believe that an EIR is needed.

The following items should be addressed through the state and local permitting processes.

- 1) Detailed timing and sequencing of project construction activities.
- 2) Provide the actual location of areas to be used for refueling and maintenance of construction equipment. These areas should be located away from resource areas on the site.
- 3) Accommodation of increased stormwater volume
- 4) The 75% design landscape plan should mitigate for wetlands disruption and preserve the tree canopy that provides the aesthetic viewshed that makes this corridor attractive to users of all modes of transportation while exemplifying the community character of Lenox.

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The Berkshire Regional Planning Commission Executive Committee considered and approved these comments at their April 8th meeting.