

To: Cambridge Conservation Commission
Re: Jerry's Pond, IQHQ NOI
From: Ingeborg Hegemann,
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Date: January 22, 2024

Comments on Notice of Intent for IQHQ – Jerry's Pond Improvements

1. Impact to Bank

It is not clear what the mitigation to the Bank is. The Notice of Intent (NOI) indicates that approximately 313 linear feet (lf) of bank will be permanently impacted. Based on the plans and profile, the impact is associated with the installation of 16" coir logs and construction of boardwalks. The NOI states that mitigation of 300 lf of Bank is proposed. It is not clear what is being done for mitigation. Page 7 of the NOI briefly addresses the proposed improvements along Rindge Avenue (*The area along Rindge Avenue will be revegetated with a variety of native plants, including more than 20 trees and over 1,500 plugs of grasses and other herbaceous species and will represent an improvement over existing conditions.*) but does not specifically address mitigation associated with the Bank itself: the portion of the land surface which normally abuts and confines a water body.

Pages 14 and 15 of the NOI address, in part, the regulatory compliance for work on Bank. Mitigation is not clearly addressed, except to discuss the increase in shading from the boardwalk. Page 15 notes that "*the Banks are proposed to be revegetated with a robust native planting schedule...*". Plan Sheet L2.1A shows the proposed planting schedule, however it does not appear that the planting is on the Bank, but rather above the regulatory Bank.

Please clarify what the proposed mitigation is.

The NOI included a Wildlife Habitat Assessment. We have questions on the Assessment, some of which are noted here.

- It is not clear why the Field Data Form indicates that Upland/Wetland Food Plants or Shrub Thickets are absent.
- The Assessment indicates there are no mammal burrows.
- The Cover/Perches/Denning/Nesting Habitat category indicates that there is no large woody debris on the ground or rocks, crevices, logs, tree roots or hummocks under the water's surface or within 1 meter above the water's surface, or that there are no rock piles, crevices, or hollow logs present.
- The Field Data Form also does not note undercut or overhanging banks.
- The Field Data form indicates there is evidence of significant chemical contamination.
- It should be noted that this resource area is a significant resource area in the vicinity of an otherwise developed area and also connected by an extensive floodplain. Because Jerry's Pond is degraded now, does not mean the degraded condition

should be its “existing” condition, against which the possibility for mitigation should be measured.

If the Assessment is not correct or if there is missing data, the NOI can not conclude that the Project will not impair the Bank’s capacity to provide important wildlife habitat functions. In addition, while the benefits of shade to wildlife habitat is noted, the addition of shade associated with a structure (the boardwalk) should not be compared to the filtered shade associated with vegetation.

2. Bordering Vegetated Wetland

The area of proposed replication is shown on Plan Sheet L2.1A, the planting plan. However, it is not shown on Sheet L3.1, the grading and layout plan. Please show the proposed grading for the replication area. The elevation of the replication area should be similar to the elevation of the existing wetland system, as noted in the NOI narrative.