



Projects:\5590\Fenn School\NOI

PRINCIPALS

July 10, 2020

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**Subject: DEP File No. 137-1534  
Additional Information for Proposed Seasonal Floating Dock  
767 Monument Street, Concord, Massachusetts  
Fenn School - Applicant**

Maria B Hartnett  
Richard M Lampeter, INCE  
Geoff Starsiak, LEED AP BD+C  
Marc Bergeron, PWS, CWS

Dear Commission Members:

With collaboration from the Fenn School, Inc. ("Fenn School"), Epsilon Associates Inc. ("Epsilon") submits this additional information package in response to comments from Ms. Delia Kaye (email dated, June 30, 2010) plus questions and comments raised during the Public Hearing on July 1, 2020. Following are the question / comments in italics typeface followed by our response in normal typeface.

ASSOCIATES

**Delia Kaye's Comments June 30, 2020**

Alyssa Jacobs, PWS  
Holly Carlson Johnston  
Brian Lever

*Wetlands were approved under a 2018 Order of Resource Area Delineation on a plan prepared by Stamski and McNary. The proposed project is shown on a plan prepared by Samiotes Consultants, and it is difficult to understand the project impacts as the resource areas are not clearly shown. For example, the application notes no impact to BVW, but from the Samiotes plan, it appears that a portion of the gangway falls within this resource area. The project plans should be revised to show the approved resource area boundaries in relation to the proposed work so that project impacts are clear.*

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The wetland boundaries approved pursuant to the 2018 ORAD were depicted on the original Notice of Intent ("NOI") plan set. The revised plan includes the flag symbol to better identify the previously approved boundaries. The gangway is suspended over the ground surface to avoid altering BVW and Bank. See the revised NOI plan set which include a cross-section through the seasonal dock and gangway to show how this layout avoids altering the ground surface.

978 897 7100

FAX 978 897 0099

*Please clarify if the canoe rack is a permanent structure, and show its location on the plans.*

The canoe rack is not a permanent structure and not attached to the ground. The existing rack is depicted on the revised NOI plans. The existing temporary rack and storage lockers are located outside of the 50-Foot No-Build Zone ("50-foot NBZ"). The future racks also will be located in this same area, outside of the 50-foot NBZ during the boating season, as well as the off-season. The storage lockers are removed from the canoe launch area during the off-season, while the canoes racks remain in the launch area during the off-season.

*Mitigation is proposed in the form of over-seeding 1.3 acres of existing hayfield with a pollinator seed mix, within the 50-foot NBZ of the two onsite wetlands. Meadow installation is not easily accomplished with simply overseeding an established turf area. Please provide documentation that this method has proved successful on other applications and/or provide a more robust approach. Please also describe how the limits of the pollinator meadows will be established so this is clear in the field to the Contractor doing the work.*

The proposed means and methods to establish a plant community to enhance pollinator habitat involves full soil preparation and seeding with the specified seed mix. Seeds for many of the specified species require overwintering for the seeds to germinate in the spring, thus an autumn seeding is preferred. The soil preparation and seeding would include:

1. Mow the planting area, cutting it close to the ground surface.
2. Till, or roto till, the area to loosen the soil and disrupt growth of the existing vegetation.
3. Over seed the area with the specified seed mix. Seed in the autumn. Since this involves full soil preparation, we suggest adding annual rye to the seed mix to quickly stabilize the exposed soils and minimize erosion of the tilled soils until the perennial species germinate, grow and stabilize the soil.

The full soil preparation method will give the seed (seedlings) the best opportunity to compete with the established vegetation. Less disruptive methods, e.g. mowing and slice seeding; or mowing, disking and slice seeding, are less disruptive but will retain existing vegetation which will have a competitive advantage over the seedlings as they sprout. Fall seeding likewise reduces the opportunity for the annual rye to set seed before winter freeze and thus it will only have a low percent cover the following season, and cover by annual rye will decline over time and largely be non-existent by year 2 or 3.

*Also consider not mowing the entire hayfield (with the exception of the proposed trail) until November to allow natives to establish. This would be beneficial for pollinators – including fireflies – as well as provide an educational opportunity for students. Further,*

*the approximately 12-acre field is large enough to support grassland-nesting bobolink. After the field was mowed last month, we received a call that “the bobolinks had been mown down”. We recommend that the field be mown outside the growing and breeding season (i.e., between November 15 and April 15), to encourage establishment and reseeding of native perennials and successful breeding habitat for bobolink.*

The field is in agricultural use and maintained / mowed by a local farmer consistent with use as Section 61 A. land. This has been the practice for the past 10-years or more.

*Provide temporary and permanent impact area for work within the 0-25 No Disturb Zone and the 25-50 foot No Build Zone. Waivers for work in these resource areas also need to be provided (i.e. written responses to each of the criteria).*

The only permanent alteration in the 0-25 foot No Disturb Zone (“NDZ”) is the installation of two 10-inch diameter sono tubes for the gangway footing. Combined these represent less than 1 square foot (0.545 square foot) alteration. The gangway will be installed seasonally, and as depicted on the revised NOI plans, it is elevated above the existing grade to avoid alteration of the land surface regulated as the 25-foot NDZ, buffer zone, BVW and Bank. No structures (temporary or permanent) are proposed in the 25- to 50-foot NBZ.

Temporary structures in the 100-foot buffer zone are limited to the existing and proposed canoe racks. A loaded canoe rack holds six canoes and the suspended canoes cover an area approximately 160 square feet. The two rack feet occupy about four square feet (each foot is an approximately 4-foot-long round wooden rail about 6 inches in diameter). Three additional canoe racks (four total) will be required to support the maximum expected canoe count of 22 canoes and thus combined the rack feet would occupy about 16 square feet. During the off-season the racks, floating dock sections and gangway will be stored outside of the 50-foot NBZ.

On behalf of the Fenn School we request a waiver to authorize the gangway in the 25-foot NDZ. Below we address the factors to support this waiver request.

*The **waiver request for work in the 25-foot NDZ** should address the following:*

- a. the Commission finds in writing, after said public hearing that there are no reasonable conditions or alternatives that would allow the proposed activity to proceed in compliance with said Regulation;*

The seasonal dock needs to be located in the river and access to the dock from the dry land is needed to access the seasonal dock. Thus, there is no alternative that would allow the dock to be installed with access from dry land without locating the gangway footing in the 25-foot NDZ.

- b. *avoidance, minimization, and mitigation have been employed to the maximum extent feasible; and either,*

The use of two 10-inch diameter sono tubes as the gangway footing is the least intrusive option to provide a secure footing. The alternative of a concrete slab was considered, however that would occupy a larger area than the sono tubes and thus was rejected. Resting the gangway directly the ground surface was likewise considered. That option too was rejected because it would result in about 20 to 25 square feet of the gangway resting on the ground surface with the potential to alter the 25-NDZ, buffer zone and BVW. Thus, that option was rejected. The two sono tube option is the least intrusive and raises the gangway above ground surface to avoid altering the 25-foot NDZ, buffer zone, BVW and Bank.

- c. *the project, considered in its entirety would result in a net benefit of resource area values; or*

It is our opinion that the use of seasonal dock to launch and land canoes is the environmentally responsible option as compared to hauling canoes into and out of the river. The Fenn School is a middle school (grades 4 – 9). In this age range not all students have the strength to carry the canoes over the bank while launching or landing canoes. Therefore, we expect canoes will often times be dragged on the bank. As stewards of the river, the Fenn School proposes the dock as a means to provide boating opportunities to the students while concurrently protecting the bank. In this way the seasonal dock provides a net benefit to the resource areas of BVW, Bank and Land Under Water (“LUW”).

- d. *the waiver is necessary to accommodate an overriding public interest or to avoid a decision that so restricts the use of the property as to constitute an unconstitutional taking without compensation.*

The school has a right to access the river over the bank with canoes. This proposed seasonal dock, as described above and in the NOI, allows the school’s students to access the river without altering the resource areas of BVW, Bank and LUW. Thus, this seasonal dock allows the school’s students to access the river in accordance with the Public Waterfront Act (M.G.L. Ch. 91) and concomitantly protects the interests of the Wetlands Protection Act and the By-law.

Because the proposed seasonal dock supports the public interest protected by M.G.L. Ch. 91, that is preserving pedestrian access along the river’s edge for fishing, fowling and navigation (i.e. proper public purpose); as well as protecting the public interests protected by meeting the performance standards established in 310 CMR 10.00 to protect the interests of the Wetlands Protection Act; we believe the overriding public interest is met.

*A review of **50 foot No Build Zone** (“NBZ”) policy is presented below:*

The only structure proposed within the 50-foot NBZ from the river is the gangway footing, comprised of two 10-inch diameter sono tubes, and located within 25 feet of the riverbank. No structures, temporary or permanent are proposed within the 25-50-foot NBZ. Mowing in the 50-foot NBZ is needed to maintain a turf grass community in the canoe launch area.

No structures are proposed in the 50-foot NBZ associated with the two on-site BVWs. Activity in the 50-foot NBZ of those BVWs is limited to establishing a pollinator meadow plant community in the 50-foot NBZ.

On behalf of the Fenn School we request a waiver to authorize the gangway in the 50-foot NBZ. Following is a review of the NBZ Policy relative to the seasonal dock and related activities to support this waiver request.

*Applicants seeking permission to place or extend a structure in the **50-foot No Build Zone** shall submit a waiver request to the satisfaction of the Commission that:*

As described above the only “structure” in the 50-NBZ is the gangway footing.

- i. There are no reasonable conditions or alternatives that would allow the proposed activity to proceed in compliance with this Policy. In demonstrating this condition, an applicant shall submit an Alternatives Analysis that evaluates all possible designs that allow work to meet setback requirements with written justification regarding why work in the NBZ is necessary and shall include, at a minimum, the following information:*

- a. Degree, date of and scale of past alterations in the buffer zone*

Previous alteration on the buffer zone associated with the river and BVWs is limited to periodic mowing. The buffer zone in the canoe launch area is mowed periodically to maintain a low ground so that students and faculty can launch and land canoes. Canoes are stored on the existing canoe rack located in the buffer zone.

Alteration in the buffer associated with the BVWs is limited to period haying during the growing season in accordance with agricultural uses of the property.

- b. Slope of the buffer zone*

The slope in the buffer zone associated with the BVW (flags B+C 1 – 13) along the easterly property liner and in the canoe launch area (Flags B+C 11 – 19) is approximately a 3% slope. The buffer zone north of the BVW along the westerly property line (Flags B+C 1 – 9) is steeper ranging from approximately a 12% slope along the property line to approximately 4% at Flag B+C 10.

*c. Species composition of vegetation in the 25-foot and 50-foot buffer zones*

The majority of buffer zone is a maintained hay field dominated by hay grass species. Along the river in the canoe launch area the ground cover is dominated by turf grasses and supports sparse tree cover dominated by red maple.

*d. Ecological integrity of the adjacent wetlands*

There are two on-site vegetated wetlands; one along the easterly property line, and the other along westerly property line which extends along the river.

The easterly wetland has limited ecological integrity because it is surrounded by active agricultural land use. See NOI Figure 2.

The Concord River and associated BVW is part of a relatively intact riparian corridor along the northerly bank of the river. The riparian corridor is considered to have relatively significant ecological integrity because it can provide travel corridor habitat, contains borrowable soils banks, can support perching and nesting sites, plus the overhanging tree canopy helps to maintain river water temperatures.

*e. Importance of the buffer zone to wildlife utilizing the wetland*

Although the river corridor may have relatively high ecological integrity, the buffer zones are primarily managed as hayfield which diminishes the wildlife habitat quality of the buffer zones.

*f. Any ecological benefits arising from proposed mitigation, such as removal of invasive vegetation or creation of enhanced wildlife habitat*

To mitigate for the gangway footing in the 0-25 foot NDZ and the seasonal support posts in the river bottom (Land Under Water), Fenn School proposes to establish over 1 acre of pollinator meadow in the 50-foot NBZ of the two BVWs. These two areas will be managed to maintain the pollinator meadow and thus will enhance the habitat quality of the buffer zone compared to current conditions.

*g. Any public benefits arising from the proposed activity*

It is our opinion that the use of seasonal dock to launch and land canoes is the environmentally responsible option as compared to hauling canoes into and out of the river. As described above, not all students have the strength to carry the canoes over the bank while launching or landing canoes. Therefore, we expect canoes will often times be dragged on the bank. As stewards of the river, the Fenn School proposes the dock to provide boating opportunities to the students while concurrently protecting the bank. In this

way the seasonal dock protects the public interests protected by the Wetlands Protection Act and Concord Bylaw.

*h. Photographs of the area to be disturbed; and*

See the photographs (Figures 6a – 6d) in NOI Attachment B.

*ii. Avoidance, minimization, and mitigation have been employed to the maximum extent practicable. When encroachment of proposed structures into the NBZ is unavoidable, the applicant must mitigate the encroachment by naturally revegetating an area 10 times greater than the encroachment; and*

The only proposed structure within 50-feet of the top of bank are the two 10-inch diameter sono tube footings which is the least intrusive option to provide a secure footing. This option will elevate the gangway above the ground surface to avoid altering the ground surface in 25-foot NDZ, buffer zone, BVW and Bank. No structures, temporary or permanent, are proposed within the 25- to 50-foot NBZ. Activities in the 50-foot NBZ is limited to continued mowing in the canoe launch area to maintain it as turf grass.

The proposed pollinator meadow will involve re-planting this are with native species to establish over an acre of pollinator meadow. This mitigation far exceeds standard of revegetating an area 10 times greater than the encroachment.

*iii. The project, considered in its entirety, will result in a net benefit of resource area values; or*

It is our opinion that the use of the seasonal dock to launch and land canoes is the environmentally responsible option as compared to hauling canoes into and out of the river. As stewards of the river, the Fenn School proposes the dock as a means to provide boating opportunities to the students while concurrently protecting the riverbank. In this way the seasonal dock provides a net benefit to the resource areas of BVW, Bank and Land Under Water (“LUW”).

*iv. The waiver is necessary to accommodate an overriding public interest or to avoid a decision that so restricts the use of the property as to constitute an unconstitutional taking without compensation.*

The school has a right to access the river over the bank with canoes. This proposed seasonal dock, as described above and in the NOI, allows the school’s students to access the river without altering the resource areas of BVW, Bank and LUW. Thus, this seasonal dock allows the school’s students to access the river in accordance with the Public Waterfront Act (M.G.L. Ch. 91) and concomitantly protect the interests of the Wetlands Protection Act and By-law.

Because the proposed seasonal dock supports the public interest protected by M.G.L. Ch. 91, that is preserving pedestrian access along the river’s edge for fishing,

fowling and navigation (i.e. proper public purpose); as well as protecting the public interests of the Wetlands Protection Act; we believe the overriding public interest is met.

**Comments and issues raised during the Public Hearing by Commissioners and the Public.**

*Demarcate on the plans the 25-foot NDZ, the 50-foot NBZ and the 100-foot buffer zone.*

The 25-foot NDZ and 50-foot NBZ are depicted on the revised NOI plans. The 100-foot buffer zone extends beyond the image area of the seasonal dock and gangway plans.

*Show or note the off-season storage area of the seasonal dock sections and canoes.*

The dock sections, gangway and canoes will be stored outside of the 50-foot NBZ and outside of the 100-year flood plain (regulated as Bordering Land Subject to Flooding). They will be stored in the vicinity of the existing canoe rack which is depicted on the revised project plans.

*Develop a standard operating procedure for installing and removing the seasonal dock and what equipment will be used, if any, for installation and removal.*

Fenn expects this to be a condition of the Order of Condition and will coordinate with the appropriate parties (e.g. dock manufacturer, engineer, facilities staff) to develop the procedure and provide that the Commission's staff before the dock is installed for the first time.

*The seasonal dock is expected to collect floating debris. How will the school address that issue?*

The school's facility staff will inspect the dock on a regular basis, at least three times per week, and will remove the debris. Trash will be removed from the river for proper disposal. Organic matter (e.g. leaves and sticks) will be deposited in the river downstream from the dock so that nutrients and organic matter are not removed from the river ecosystem.

*Will the dock be used by the summer camp program?*

Yes, it is expected that canoeing will be offered to summer campers. The increased use of canoes supports the need for the seasonal dock to minimize traffic over the riverbank to launch and land canoes.

*The river is narrow and the floating docks will obstruct the river and interfere with wildlife movements.*

The river is approximately 135 feet wide at the easterly edge of the dock and wider to the west. We have re-oriented the dock so that it is parallel with the shoreline and now extends approximately eight to 12 feet into the river. This orientation leaves over 120 feet of unobstructed river corridor.

*Where will the dock sections and canoes be stored off-season?*

The dock sections, gangway and canoes will be stored on the 676 Monument Street parcel outside of the 50-foot NBZ and 100-year flood plain (regulated as Bordering Land Subject to Flooding), in the vicinity of the existing canoe rack.

*What are the number of canoes to be used by Fenn School?*

The number of canoes is based on programming. An entire class or camp group long with the accompanying and trained adults will use the canoes (and dock) during a single session. A class tends to have 14 to 16 students; thus 8 to 10 canoes would be used during a session, assuming two students per canoe. A fair limit to Fenn's canoe count is 22 which allows for two groups to be on the water at one time plus two canoes with adults and a safety canoe on shore.

*What is the master plan for 676 Monument Street and will other support structures be added in the canoe launch area in the future (e.g. boat house, parking, etc.)?*

There are no other structures planned for the canoe launch at this time. The leadership at Fenn is having ongoing discussions regarding the use of 676 Monument Street and to date have not come to agreement on the use or programming of this parcel. Regarding the WPA and the Concord Wetlands Protection Bylaw, the on-site wetlands and their boundaries plus the accompanying buffer zones have been established, therefore any proposed alteration in wetland resource areas or within 100 feet of those resources will require the Fenn School to seek needed approvals before anything can be implemented.

We look forward to discussing the project at the next Commission meeting, schedule for July 22, 2020. If you have any questions regarding this NOI please do not hesitate to contact me at (978) 897-7100 or via e-mail at [ddunk@epsilonassociates.com](mailto:ddunk@epsilonassociates.com).

Sincerely,  
EPSILON ASSOCIATES, INC.

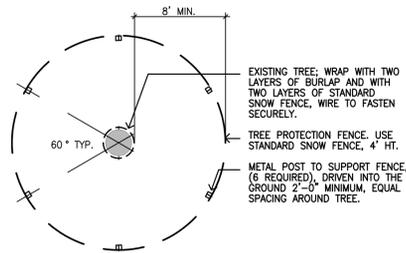
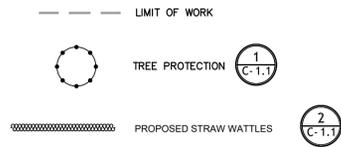


Dwight R. Dunk, LPD, PWS, BCES  
Principal

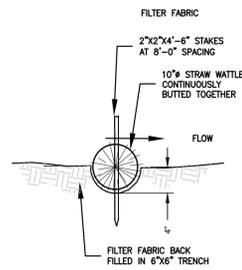
encl. Revised NOI Plan Set (Revision date: 07/09/2020)

cc: MassDEP NERO  
D. Platt, Fenn School

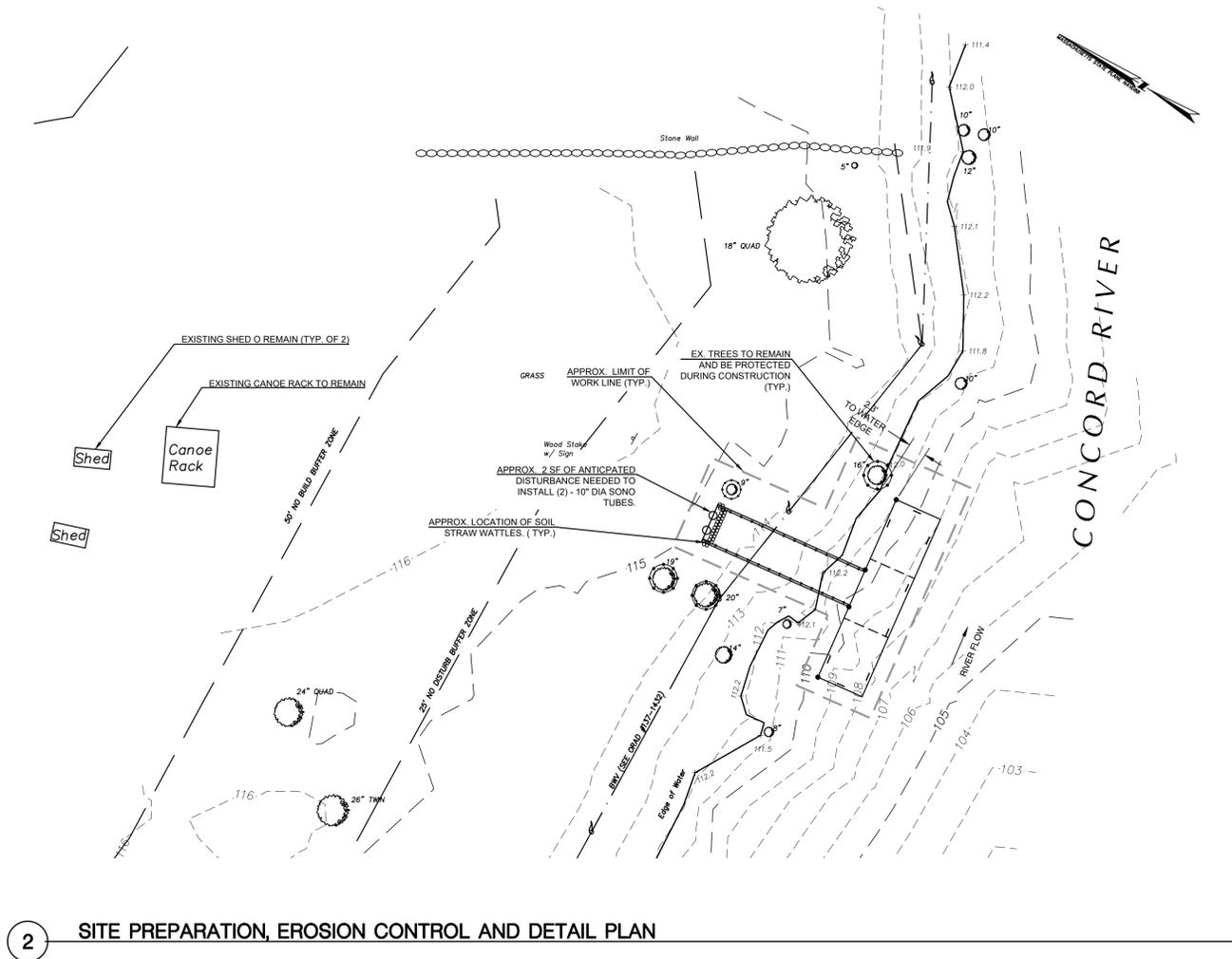
**DEMOLITION LEGEND:**



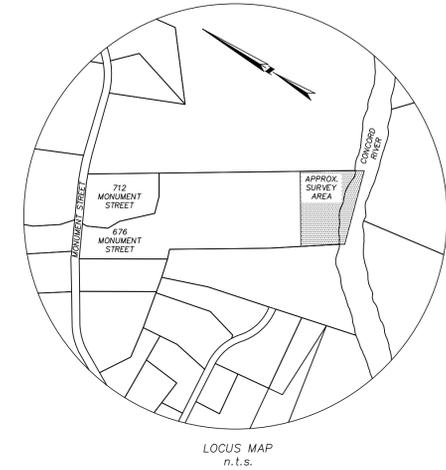
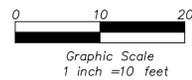
**1 EXISTING TREE PROTECTION**  
SCALE: NTS



**2 STRAW WATTLE**  
NTS



**2 SITE PREPARATION, EROSION CONTROL AND DETAIL PLAN**



FOR PERMITTING PURPOSES ONLY

FENN SCHOOL DOCK  
676 MONUMENT STREET  
CONCORD, MA

SEAL



REVISION		
1	07/09/2020	COMMENTS FROM NRC

SITE PREPARATION,  
EROSION CONTROL  
AND DETAIL PLAN

JOB # 19094.00  
DATE: 06/17/2020  
SCALE: 1"=10'  
DRAWN BY: DTB  
APPROVED BY: SRG

**C-1.1**  
SHEET 1 OF 2

**NOTES AND SPECIFICATIONS**

1. ALL SURVEY INFORMATION OF EXISTING CONDITIONS, INCLUDING BUT NOT LIMITED TO PROPERTY LINES, FENCES, PAVING, OVERHEAD WIRES, ETC. ARE BASED ON THE ON A SURVEY BY SAMOTES CONSULTANTS INC. AS DEPICTED EXISTING SITE PLAN. ALL SUCH INFORMATION IS APPROXIMATE AND THE CONTRACTOR IS RESPONSIBLE TO SURVEY AND FIELD VERIFY SUCH INFORMATION PRIOR TO CONSTRUCTION. CONSTRUCTION DELAYS AND/OR OTHER DAMAGES RESULTING FROM DISCREPANCIES BETWEEN INFORMATION PROVIDED AND ACTUAL EXISTING CONDITIONS WILL BE AT NO ADDITIONAL COST TO THE OWNER.
2. THE CONTRACTOR SHALL NOTIFY AND COORDINATE ALL WORK WITH THE RESPECTIVE UTILITY COMPANIES 48 HOURS PRIOR TO CONSTRUCTION.
3. THE CONTRACTOR SHALL REGISTER WITH "DIG SAFE" AT (888) DIG-SAFE, 72 HOURS PRIOR TO CONSTRUCTION. IT IS THE CONTRACTOR'S RESPONSIBILITY TO MAINTAIN "DIG SAFE" REGISTRATION AND "DIG SAFE" MARKINGS.
4. ALL WASTE MATERIAL SHALL BE DISPOSED OF IN ACCORDANCE WITH ALL FEDERAL, STATE AND MUNICIPAL REGULATIONS.
5. ALL WORK SHALL COMPLY WITH FEDERAL, STATE AND MUNICIPAL REGULATIONS AND STANDARDS.
6. THE CONTRACTOR SHALL HAVE THE PROPER LICENSES AS REQUIRED BY THE STATE AND ANY OTHER GOVERNING AGENCIES.
7. ADA AND MAAB COMPLIANCE

A. SPECIAL ATTENTION IS TO BE GIVEN TO COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT (ADA) AND THE REQUIREMENTS OF THE MASSACHUSETTS ARCHITECTURAL ACCESS BOARD (MAAB)

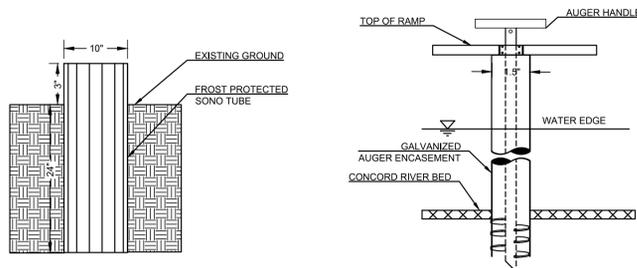
a. SLOPES: ALL WALKWAYS AS DEFINED BY SECTION 22.1 OF 521 CMR SHALL BE GRADED TO A MAXIMUM 4.5%. THE CROSS PITCH (PERPENDICULAR TO TRAVEL) FOR ALL WALKWAYS AND PATHS SHALL BE CONSTRUCTED AT 1.5%. THE SLOPE OF ALL RAMPS AND SIDE SLOPES OF HANDICAP CURB CUTS AS DEFINED BY SECTION 21.1 OF 521 CMR SHALL BE CONSTRUCTED AT 7% MAXIMUM. RAMPS AS DEFINED IN SECTION 24.1 OF 521 CMR SHALL BE CONSTRUCTED TO A MAXIMUM SLOPE OF 7%.

b. THE CONTRACTOR IS TO ASSUME THAT ALL GRADES IN PEDESTRIAN PATHS OF TRAVEL SHALL BE VERIFIED/CHECKED WITH A 2-FOOT ELECTRONIC "SMART LEVEL".

c. A 5'-0" MINIMUM LEVEL (1.5% SLOPE) AREA SHALL BE PROVIDED AT ALL FLUSH ENTRANCES TO BUILDINGS. PUDDLING OF WATER AT THE ENTRANCES WILL NOT BE ALLOWED.

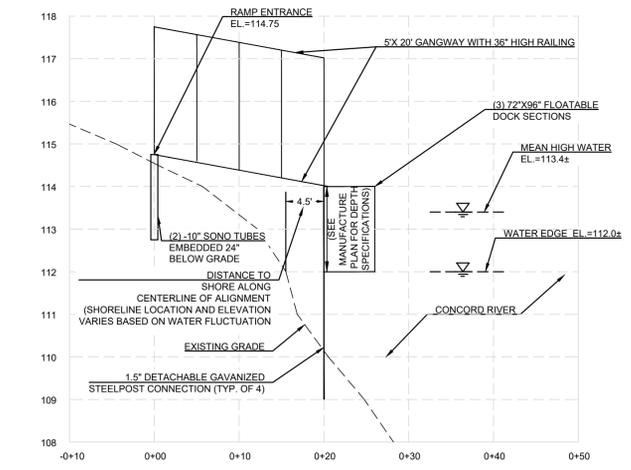
B. THE ABOVE REQUIREMENTS SHALL SUPERSEDE THE GRADES SHOWN ON THE PLANS. IF THESE REQUIREMENTS CANNOT BE MET WITH THE GRADES SHOWN ON THE PLANS, THE ENGINEER SHALL BE NOTIFIED IMMEDIATELY FOR DIRECTION.

8. CONCRETE FOR SONO TUBE SHALL BE NON-REINFORCED. CONCRETE SHALL BE "CLASS D" IN ACCORDANCE WITH SECTION M4.02.00 OF THE MASSACHUSETTS DEPARTMENT OF TRANSPORTATION - HIGHWAY STANDARD SPECIFICATIONS FOR HIGHWAYS AND BRIDGES. MassDOT - HIGHWAY STANDARD SPECIFICATIONS LATEST EDITION, WITH 620 LBS. OF PORTLAND CEMENT, 6% ± 1% AIR ENTRAINMENT IN PLACE.

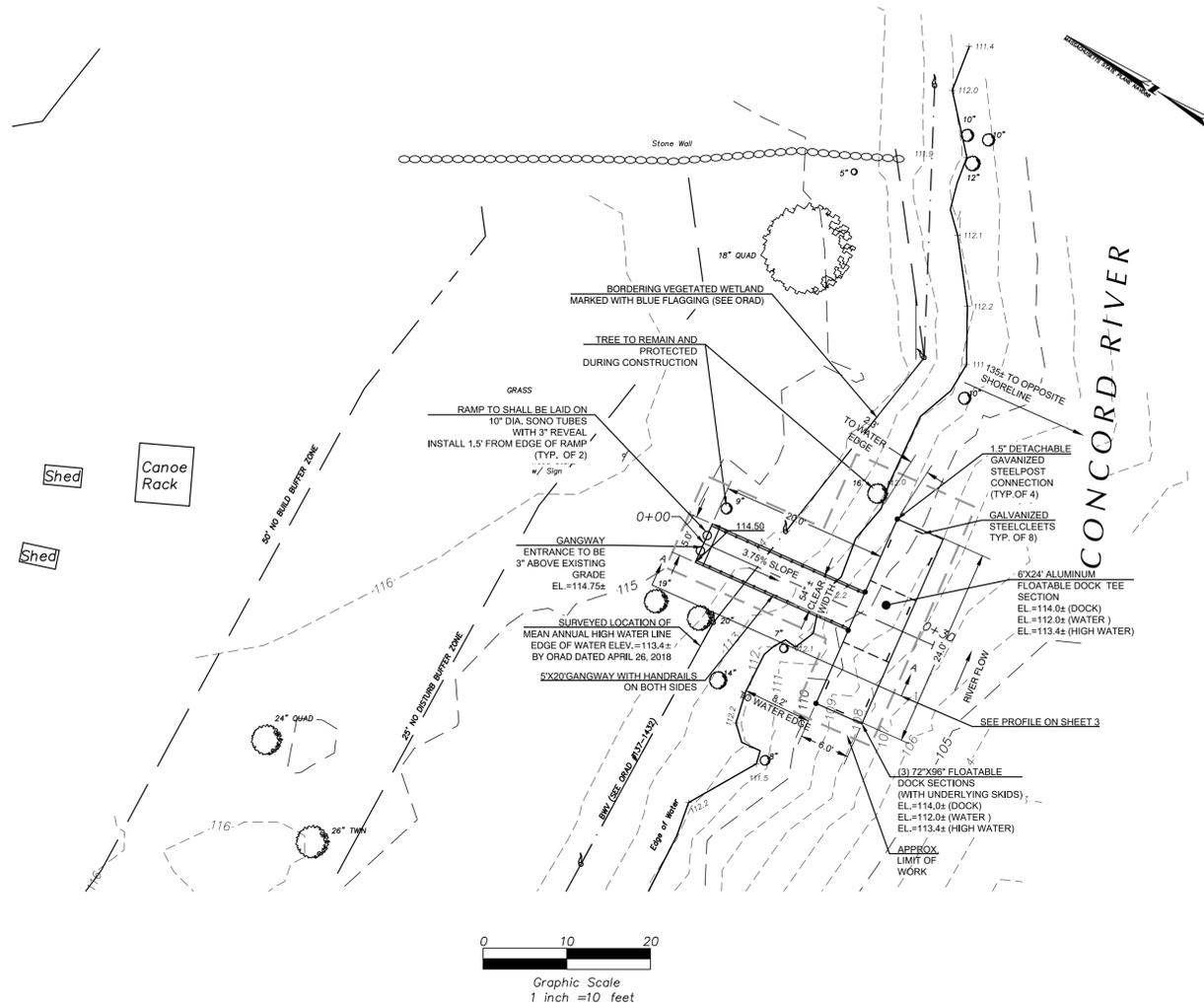


1 SONO TUBE DETAIL  
SCALE: NTS

2 AUGER ENCASUREMENT DETAIL  
SCALE: NTS



3 DOCK PROFILE A-A  
SCALE: 1:10 (H)  
1:2 (V)



FOR PERMITTING  
PURPOSES ONLY

FENN SCHOOL DOCK  
676 MONUMENT STREET  
CONCORD, MA

SEAL



REVISION		
1	07/09/2020	COMMENTS FROM NRC

PROPOSED SITE  
LAYOUT AND  
GRADING PLAN

JOB # 19094.00  
DATE: 06/17/2020  
SCALE: 1"=10'  
DRAWN BY: DTS  
APPROVED BY: SRG  
SHEET 2 OF 2

C-1.2