

Operation, Maintenance & Monitoring Plan for
Stormwater Best Management Practices (BMPs)
and Wetland and Buffer Zone Plantings
At the
AM Radio Tower Location
1277 Kempton Street, New Bedford, MA

Prepared for:



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Appendices

Appendix A

Inspection and Maintenance Forms

Appendix B

As-Built Plans (to be included after Construction)

1.0 Introduction

The Massachusetts Clean Energy Center is under agreement to purchase a parcel of land (City of New Bedford Plot) adjacent to St. Mary's Cemetery, for the relocation of an AM radio tower previously located in the South End of New Bedford. The project's goal is to remove the radio tower from its current site in order to allow the construction of the New Bedford Marine Commerce Terminal. As part of the balance between development and environmental protection, the project proposes various Stormwater Best Management Practices (BMPs) to capture and treat runoff from the developed area and maintain the ecological integrity of the wetland resource areas. The project will also include an aggressive post-construction monitoring program to ensure that vegetation disturbed during the construction process is re-established and allowed to re-colonize.

2.0 Purpose

This Operation, Maintenance and Monitoring Plan (OM&M Plan) provides a mechanism for the consistent inspection and maintenance of stormwater drainage structures installed during the course of the Project. Included in this OM&M Plan is a description of the stormwater structure, the location of each structure, an inspection schedule for each stormwater structure, and a standard form to be utilized to document the inspection and maintenance of each stormwater structure. The Massachusetts Clean Energy Technology Center will be responsible for the Operation and Maintenance of the proposed Stormwater BMPs and the vegetative plantings. We estimated that the annual expense will be \$1,200 for all of the tasks described herein. This OM&M additionally addresses monitoring and maintenance of plantings and re-colonized vegetation within the BVW and the buffer zone that will be temporarily disturbed during construction.

3.0 Descriptions and Locations of BMPs

3.1 Description

There is one RainGarden, one subsurface recharge galley and one water quality swale proposed for this Project. For a more detailed description, refer to Plans entitled "*New Bedford Site Development Kempton Street and Route 140, Map 61 Lot 2*" dated 5/21/14. Reduced 11 x17 plans are included in Appendix B. Full size (24"x36") plans are on file at the City of New Bedford Office of Environmental Stewardship.

3.1.1 RainGardens

RainGardens function as soil and plant-based filtration devices that remove pollutants through a variety of physical, biological, and chemical treatment processes. The RainGarden used in this Project utilize a bioretention system consisting of a soil bed planted with native vegetation all located above an underdrain layer. Stormwater runoff entering the RainGarden system is filtered through the hardwood bark mulch layer and then the bioretention soil mixture before being collected and then conveyed downstream by the underdrain system. Runoff storage depths above the planting bed surface are less

than 6 inches. Bioretention systems are used to remove a wide range of pollutants, such as suspended solids, nutrients, metals, hydrocarbons, and bacteria from stormwater runoff. They can also reduce the peak runoff rates and increase stormwater infiltration when designed as a multi-stage, multi-function facility.¹

3.1.2 Vegetated Swales

Water Quality Swales are designed primarily for the prescribed stormwater quality volume and have incorporated specific features to enhance their stormwater pollutant removal effectiveness, including crushed stone check dams. Pollutant removal rates are significantly higher for water quality swales than normal drainage channels.²

3.1.3 Subsurface Recharge Chambers

There is one subsurface recharge galley, a flow diffuser type model of precast concrete 4 ft. wide by 8 ft. long by 1.5 ft. high. These engineered structures are designed to provide runoff storage and recharge back into the ground. The galley is designed to sit on a bed of washed crushed stone and be surrounded by crushed stone on all sides. An inspection port is brought to within 6 inches of the finished grade.

3.1.4 Crushed Stone Check Dams

Crushed stone swales are designed primarily for runoff peak flow control. The proposed crushed stone check dams reduce velocity of runoff coming off the access drive within the vegetated swale.

3.1.5 Wetland and Buffer Zone Plantings

Areas disturbed during the construction process, both within the wetland resource area and within the adjacent buffer zone will be replanted at a high density with both herbaceous and woody (shrub) species. It is anticipated that the inclusion of plants that provide various forms of cover and food sources at different times of the year may enhance the overall habitat value of the wetland. Disturbed BVW is proposed to be replanted with a seed mix as well as a variety of wetland shrubs, such that 75% cover is anticipated to be achieved within two growing seasons.

3.2 Location

The drainage BMPS are located at the AM Radio Tower site, adjacent to St. Mary's Cemetery and Route 140, off of Kempton Street in New Bedford, MA. The locations are also shown provided in Appendix B of this Manual.

¹ New Jersey Stormwater Best Management Practices Manual, February 2004, Chapter 9.1, "Standard for Bioretention Systems."

² Massachusetts Department of Environmental Protection and Office of Coastal Zone Management, "Stormwater Management, Volume II, Stormwater Technical Hand Book, March 1997, Chapter 3D, Water Quality Swales."

4.0 Inspection Frequency, Safety, and Schedule

4.1 Inspection Frequency

A complete and thorough inspection of the system using the inspection and maintenance forms provided in Appendix A of this Manual shall be performed once a month during the first six months following completion of construction activities and then on a semi-annual basis (once in the spring and once during the fall) and after major rain events (approximately 2.0 inches of rain). See Section 5.0 Implementation and Maintenance Procedures for a description of the inspection activities.

4.2 Inspection Safety

The inspector performing the inspections on the drainage structures and vegetation must have the proper safety equipment (heavy duty gloves, steel-toed boots, hard hat, and first aid kits, etc.) and training before conducting any inspections. If the drainage structures reveal any safety problems the site activities may need to be modified to reduce or eliminate the safety risk. The following is a list of safety precautions the inspector should be aware of when conducting the drainage structure inspections.

- Never enter a confined space unless you have proper Occupational Health and Safety Administration (OSHA) training. Do not enter any confined space until the atmosphere has been checked and proper safety equipment is worn or erected.
- Check the ventilation in the drainage structures before using any ignitable materials. Some drainage structures may be sealed or have poor ventilation, posing a safety risk to the inspector if the vapor comes in contact with an open flame. Also, be sure to allow the drainage structures to vent for a period of time if a peculiar odor is present.
- Wear gloves if any mechanical parts or structures components are going to be handled. Wearing gloves not only reduces the risk of getting cuts and abrasions, but also reduces the exposure of pollutants to the skin.
- Lift manhole covers or other structural covers (access covers, grates, etc.) carefully. These items can be very heavy and if wet, can be slippery. Also, learn the correct way to lift heavy items to avoid back injury.
- Check the water depth of the system before you take a step in the water. The water may be deeper than you think or there may be steep slopes below the water line.
- Be aware that nails, broken glass, or other sharp debris may be in the storm water system and can cause injury. Wearing the proper safety clothing will reduce the safety risk associated with these objects.
- Because the site is primarily wooded and covered with vegetation, ticks, mosquitos and other pests can represents a risk. Products containing permethrin kill ticks. Permethrin can be used to treat boots, clothing and camping gear and remain protective through several washings. Use a repellent with DEET on skin. Repellents containing 20% or more DEET (N, N-diethyl-m-toluamide) can protect up to several hours. Always follow product instructions. Long sleeves and long pants are recommended to be worn to minimize exposed skin areas. After the site visit, check clothing and body for ticks, and remove any found as soon as possible, using tweezers and pulling the tick straight out.

- Be aware of the risk of poison ivy, poison oak and poison sumac. Wear long pants, long sleeves, boots and gloves to minimize the amount of skin exposed. After the site visit, be sure to wash your clothing to ensure any oil from these plants is removed from the clothing.

4.3 Maintenance

All maintenance work must be done in accordance with OSHA regulations. Maintenance personnel will have the proper safety equipment (heavy duty gloves, steel-toed boots, hard hat, first aid kits, etc.) and training before performing any maintenance on the drainage structures. The following is a list of safety precautions maintenance personnel should be aware of when they perform maintenance on the drainage structures.

- Operate equipment safely and in accordance with the manufacturer's specifications. Equipment operators must remain aware of site personnel at all times to avoid causing injury to others.
- Contact Dig Safe System Inc. at 1-888-DIG-SAFE seventy-two (72) hours before excavating a site. Underground utility wires and pipes may be present. Cover excavated areas that cannot be filled in at the end of the day. Also, be aware of overhead electrical wires that could come in contact with maintenance equipment.
- Identify where you will dispose removed sediment or wastes prior to cleaning the drainage structures. Use shovels, trowels or a high-suction vacuum to remove wastes. Do not clean sediment or waste with bare hands. The sediment or waste may be hazardous. Place the sediment or waste in an area where it cannot be washed into a storm drain or water body.
- Wear gloves if any mechanical parts or structural components are going to be handled. Wearing gloves not only reduces the risk of getting cuts and abrasions, but also reduces the exposure of pollutants to the skin.

5.0 Implementation and Maintenance Procedures

The Massachusetts Clean Energy Technology Center is responsible for inspecting and maintaining the stormwater system components and monitoring the vegetation. The following list of inspections and maintenance will be performed on the required schedule. All sediment, debris, and hydrocarbons contaminated material that are removed during the maintenance of the stormwater system components should be properly handled and disposed.

5.1 RainGardens

The primary maintenance requirement for RainGardens (Bioretention Systems) is that of inspection, and repair or replacement of the RainGarden's individual components. Typically, these activities consist of nothing more than that which is required of any landscaped area. The primary maintenance function is the removal of accumulated sediment and debris. Other potential tasks include the replacement of dead vegetation, soil pH regulation, erosion repair at inflow points, mulch replenishment and repair of inflow structures.

5.1.1 Checklist

| Table 5-1 RainGarden Maintenance Schedule |
|--|
| Soil |
| <ul style="list-style-type: none"> • Visually inspect and repair in the Spring and Fall. In the event of erosion, stabilize erosion path with ¾ inch crushed stone • Remove accumulated sediment, debris, and litter • Check the soil pH every other Spring. Apply appropriate product to adjust pH, as required. The recommended soil pH levels should range from between 5.0 and 6.0 for the raingardens. |
| Mulch |
| <ul style="list-style-type: none"> • Re-mulch any void areas by hand, as needed. • Every Spring, add a fresh mulch layer. • Every 3rd year, remove and replace mulch. |
| Plants |
| <ul style="list-style-type: none"> • Once a month during the growing season, visually inspect vegetation for disease and pest problems. • Every Spring and Fall, remove and replace all dead and diseased vegetation. • Weed, as needed. • Prune excess growth and dead branches every Spring. • During periods of drought, inspect for signs of stress (wilting, yellow, spotted or brown leaves, loss of leaves, etc.). Water in the early morning as needed. |
| General |
| <ul style="list-style-type: none"> • Annually, after a heavy rainstorm, inspect RainGardens for signs of ponding and to make sure water dissipates after a period of 4 to 6 hours. • Monthly, inspect and remove accumulated trash and debris from Raingardens. |

5.2 Vegetated Swales

The vegetated water quality swales should be inspected for slope integrity, soil moisture, health of vegetation, soil stability, erosion and sedimentation. Regular maintenance tasks include mowing, watering, weeding, pest control and sediment removal.

5.2.1 Checklist

| Table 5-2 Water Quality Swale Maintenance Schedule |
|---|
| Soil |

| |
|--|
| <ul style="list-style-type: none"> • Visually inspect and repair in the Spring and Fall. In the event of erosion, stabilize erosion path by reestablishing soil, grass, and mulch. • Every Spring and Fall, remove accumulated sediments and debris. • Check the soil pH every other Spring. Apply appropriate product to adjust pH, as required. The recommended soil pH levels should range between 5.0 and 6.0 for the water quality swales. |
| Check Dam |
| <ul style="list-style-type: none"> • Visually inspect the edges of the check dams for signs of erosion. Repair as needed. • Every spring and fall, visually inspect the surface of the crushed stone check dam for indications of clogging. Remove the clogged crushed stone and replace with an equivalent layer of ¾ inch crushed stone. |
| Grass |
| <ul style="list-style-type: none"> • Once a month during the growing season, visually inspect vegetation for disease and pest problems. • Every Spring and Fall, remove and replace all dead and diseased vegetation. • Weed, as needed. • Reseed if needed, to maintain effectiveness of vegetation for pollutant and sediment removal. • Mow at least once per year. Never cut shorter than 4 inches. • During periods of drought, inspect for signs of stress (wilting, yellow, spotted or brown leaves, loss of leaves, etc.). Water in the early morning as needed. |
| General |
| <ul style="list-style-type: none"> • In the event of heavy sediment accumulation, the vegetated water quality swale may need to be reconstructed. |

5.3 Subsurface Recharge Chambers

Inspections will be performed once during the spring and once during the fall. The chambers shall be inspected for structure and pipe conditions and sediment and trash accumulation. It is important to remove the sediment that has accumulated during the winter months before the spring precipitation. Sediment shall be removed from the recharge chambers as necessary to ensure functionality of the chambers. During the inspection, inlet and pipes will be inspected for clogs and cleaned, as needed. The recharge chambers are equipped with 6" diameter inspection ports that will be brought to grade and kept accessible for ease of inspection.

5.4 Crushed Stone Check Dams

Inspections will be performed once during the late spring and once during the fall. The check dams shall be inspected for sediment/trash accumulation. Sediment shall be removed when it has visibly accumulated where it will affect the ability of the BMP to filter runoff. The 1 ¾ in. crushed stone should be removed by raking it out and can be replaced with clean washed 1 ¾ in. crushed stone.

5.5 Wetland and Buffer Zone Plantings

Inspections will be performed once during the late spring and once during the fall, however there shall be three additional inspections per year for the first two growing seasons following construction. During the initial post-construction period, special attention will be paid to the plantings to ensure they are establishing as required.

Two specific initial inspections will serve as a benchmark for all future inspections. These inspections include the initial inspection at the time of the completion of the plantings (last phase of construction activities) and the initial post-construction inspection. During these two inspections, the benchmarks for the sampling locations and transects will be established and the photographic vantage points will also be established. These benchmarks will be used as a baseline for future inspections to see how the plantings are establishing and re-colonizing.

Plant species that do not appear to be establishing during this time shall be replaced and re-planted with a similar species. Inspections shall include photo documentation of the vegetation to establish a method of tracking the re-establishment of vegetation. Trees will be allowed to establish in the areas of the grounding array for the tower. A potential cause for concern with Trees re-establishing is when the trees reach a height at a location that could cause potential damage to the guy wire foundations should the trees fall. If and when trees grow to a height that could damage the guy wire foundations should the trees fall, such trees will be cut or topped (with stumps/trunks remaining). If trees are needed to be removed, they will be investigated on an individual basis and the Owner will coordinate with the Conservation Commission to discuss each tree prior to any removal activities occurring.

For each of the first 2 full growing seasons following construction of the mitigation site, the site will be monitored and annual monitoring reports submitted to the New Bedford Conservation Commission. Observations will occur at least two times during the growing season – in late spring/early summer and again in late summer/early fall. The reports will address the performance standards in the summary data section and will address the additional items noted in the monitoring report requirements, in the appropriate section. The first year of monitoring will be the first year that the site has been through a full growing season after completion of construction and planting. Should measures be required within two years of the end of the original monitoring period, the monitoring period will be extended to ensure two years of monitoring after the remedial work is completed.

5.5.1 Performance Standards

- The proposed vegetation diversity and/or density goals for the woody plants from the plan are met.
- Vegetative zones consist of areas proposed for various types of wetlands (shrub swamp, forested swamp, etc.).
- The mitigation site shall have at least 95% areal cover by native species.
- Planned emergent areas on the mitigation site shall have at least 80% cover by non-invasive species.

- Planned scrub-shrub and forested cover types shall have at least 60% cover by non-invasive species, including at least 15% cover by woody species.
- Soil pH will be within target range of 6.2 - 6.8 for the site.
- Soil has documented evidence of redoxymorphic features developing by the third year (Year 3) after construction.
- All slopes, soils, substrates, and constructed features within and adjacent to the mitigation site are stable

5.5.2 Monitoring Report Requirements

- 1) Project Overview (1 page): Highlighted summary of problems which need immediate attention (e.g., problem with hydrology, severe invasive species problem, serious erosion, major losses from herbivory, etc.).
- 2) Requirements: List all mitigation-related requirements as specified in the approved mitigation plan and special conditions of the permit including: the monitoring and performance and/or success standards, required financial assurances, required preservation, etc., and note whether required documents have been provided and evaluate whether the compensatory mitigation project site is successfully achieving the approved performance and/or success standards or trending toward success.
- 3) Summary Data: Summary data must be provided to substantiate the success and/or potential challenges associated with the compensatory mitigation project. Photo documentation should be provided to support the findings and recommendations, and placed in the Appendix.
 - Address performance standards achievement and/or measures to attain the standards.
 - Describe the monitoring inspection, and provide their dates, that occurred since the last report.
 - Concisely describe remedial actions done during the monitoring year to meet the performance or success standards—actions such as removing debris, replanting, controlling invasive plant species (with biological, herbicidal, or mechanical methods), regrading the site, applying additional topsoil or soil amendments, adjusting site hydrology, etc. Also describe any other remedial actions done at each site.
 - Give visual estimates of (1) percent vegetative cover for the mitigation site.
 - By species planted, describe the general health and vigor of the surviving plants, the prognosis for their future survival, and a diagnosis of the cause(s) of morbidity or mortality.
- 4) Maps/Plans: Maps must be provided to show the location of the compensatory mitigation site relative to other landscape features, habitat types, locations of photographic reference points, transects, sampling data points, and/or other features pertinent to the mitigation plan. Each map or diagram must fit on a standard 8 ½ x 11" piece of paper and include a legend, bar scale, and the location of any photos submitted for review.
- 5) Conclusions: A general statement must be included describing the conditions of the compensatory mitigation project. If performance or success standards are not being met, a brief

discussion of the difficulties and potential remedial actions proposed, including a timetable, will be provided.

6.0 Inspections and Record Keeping

An "Inspection and Maintenance Form" shall be filled out each and every time inspectional or maintenance work is performed.

A binder will be kept at the property owner's offices that contains all of the completed forms and/or photos and related material. The inspection reports in the binder will be maintained for a minimum of three years, and will include photo documentation of the inspections.

Copies of all maintenance and inspection reports shall be filed within 30 days of completion of inspection with the City of New Bedford Office of Environmental Stewardship, 133 William Street, Room 304, New Bedford, MA 02740.

A review of all Operation, Maintenance, and Monitoring actions will take place annually to ensure that these Stormwater BMPs are being taken care of in the manner illustrated in this Operation, Maintenance & Monitoring Plan.

O&M Activity Log – AM Radio Tower Site, New Bedford, MA

| Activity No. | Description of the Activity | Dates of the Activity | Activity Performed by [Name(s) and Title] |
|--------------|-----------------------------|-----------------------|--|
| 1 | | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | | | |
| 11 | | | |
| 12 | | | |



BIORETENTION MAINTENANCE INSPECTION FORM

Bioretention Cell: _____ Date: _____ Time: _____
 Weather: _____ Inspector(s): _____
 Date of last rainfall: _____ Amount: _____ Inches
 Street Location: _____

Maintenance Issues:

Comments:

Scoring Breakdown:
 N/A = Not Applicable 1 = Monitor (potential for future problem exists) *Use open space in each section to further explain scoring as needed
 N/I = Not Investigated 2 = Routine maintenance required
 0 = Not a problem 3 = Immediate repair necessary

| 1. Outlet, Underdrain, & Cleanout Condition (Inspect underdrain outlet inside catch basin) | | | | | | |
|---|-----|-----|---|---|---|---|
| Broken (replacement required?) | N/A | N/I | 0 | 1 | 2 | 3 |
| Clogging (flushing required) | N/A | N/I | 0 | 1 | 2 | 3 |
| Submerged Outlet Pipe (CB cleaning required) | N/A | N/I | 0 | 1 | 2 | 3 |
| 2. Bioretention Soil Mix Condition | | | | | | |
| Sediment/debris accumulation > 1" | No | Yes | | | | |
| Ponding more than 24 hours after rain | No | Yes | | | | |
| Soil pH | | | | | | |
| Sediment Accumulation in soil bed | N/A | N/I | 0 | 1 | 2 | 3 |
| Oil/chemical accumulation in soil bed | N/A | N/I | 0 | 1 | 2 | 3 |
| Other: | N/A | N/I | 0 | 1 | 2 | 3 |
| 3. Plant Condition | | | | | | |
| Disease/Pest Problems | N/A | N/I | 0 | 1 | 2 | 3 |
| Weeds | N/A | N/I | 0 | 1 | 2 | 3 |
| Excess growth and/or dead branches | N/A | N/I | 0 | 1 | 2 | 3 |
| Signs of drought | N/A | N/I | 0 | 1 | 2 | 3 |
| 4. Mulch Condition | | | | | | |
| Overall Condition | N/A | N/I | 0 | 1 | 2 | 3 |
| 5. Erosion | | | | | | |
| Soil and/or debris erosion | N/A | N/I | 0 | 1 | 2 | 3 |

Overall Condition of Bioretention Cell

Inspector's Summary:



VEGETATED SWALE AND CHECK DAM MAINTENANCE INSPECTION FORM

Facility Number: _____ Date: _____ Time: _____
 Weather: _____ Inspector(s): _____
 Date of last rainfall: _____ Amount: _____ Inches
 Street Location: _____ GPS Coordinates: _____

| | | |
|---------------------------|---|--|
| Scoring Breakdown: | | |
| N/A = Not Applicable | 1 = Monitor (potential for future problem exists) | *Use open space in each section to further explain scoring as needed |
| N/I = Not Investigated | 2 = Routine maintenance required | |
| 0 = Not a problem | 3 = Immediate repair necessary | |

| | | | | | | |
|---|-----|-----|---|---|---|---|
| 1. Check dams | | | | | | |
| Undermined/eroded | N/A | N/I | 0 | 1 | 2 | 3 |
| Debris/trash accumulations | N/A | N/I | 0 | 1 | 2 | 3 |
| Sediment accumulation | N/A | N/I | 0 | 1 | 2 | 3 |
| 2. Vegetated Swale | | | | | | |
| Disease/Pest problems | N/A | N/I | 0 | 1 | 2 | 3 |
| Sediment/debris accumulation | N/A | N/I | 0 | 1 | 2 | 3 |
| Weeds | N/A | N/I | 0 | 1 | 2 | 3 |
| Signs of drought | N/A | N/I | 0 | 1 | 2 | 3 |
| Consistent mowing (grass kept at minimum height of 4" or greater) | N/A | N/I | 0 | 1 | 2 | 3 |
| Other: | N/A | N/I | 0 | 1 | 2 | 3 |
| 3. Underdrain | | | | | | |
| Broken | N/A | N/I | 0 | 1 | 2 | 3 |
| Clogging | N/A | N/I | 0 | 1 | 2 | 3 |
| 4. Soil | | | | | | |
| pH level | | | | | | |
| 5. Erosion | | | | | | |
| Soil and/or debris erosion | N/A | N/I | 0 | 1 | 2 | 3 |

Overall Condition of Facility

Total number of concerns receiving a: (1) _____ - Needs Monitoring
 (2) _____ - Routine Repair
 (3) _____ - Immediate Repair Needed

Inspector's Summary:



WETLAND PLANTINGS MAINTENANCE INSPECTION FORM

Facility Number: _____ Date: _____ Time: _____
 Weather: _____ Inspector(s): _____
 Date of last rainfall: _____ Amount: _____ Inches
 Street Location: _____ GPS Coordinates: _____

Maintenance Issues:

Comments:

Scoring Breakdown:

| | | |
|------------------------|---|--|
| N/A = Not Applicable | 1 = Monitor (potential for future problem exists) | *Use open space in each section to further explain scoring as needed |
| N/I = Not Investigated | 2 = Routine maintenance required | |
| 0 = Not a problem | 3 = Immediate repair necessary | |

| 1. Plant Condition | | | | | | | |
|------------------------------------|-----|-----|---|---|---|---|--|
| Disease/Pest Problems | N/A | N/I | 0 | 1 | 2 | 3 | |
| Weeds | N/A | N/I | 0 | 1 | 2 | 3 | |
| Excess growth and/or dead branches | N/A | N/I | 0 | 1 | 2 | 3 | |
| Debris/trash accumulation | N/A | N/I | 0 | 1 | 2 | 3 | |
| General plant cover | N/A | N/I | 0 | 1 | 2 | 3 | |
| Plant diversity | N/A | N/I | 0 | 1 | 2 | 3 | |
| Signs of drought | N/A | N/I | 0 | 1 | 2 | 3 | |
| 2. Erosion | | | | | | | |
| Soil and/or debris erosion | N/A | N/I | 0 | 1 | 2 | 3 | |

Overall Condition of Wetland and Buffer Zone Plantings

Inspector's Summary:

| | |
|--------------------|--------------------|
| | |
| Photo Caption: XXX | Photo Caption: XXX |
| | |
| Photo Caption: XXX | Photo Caption: XXX |
| | |
| Photo Caption: XXX | Photo Caption: XXX |