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December 27, 2022

Leo Immonen, Chair  
c/o Darryl Luce, Conservation Agent  
Wrentham Conservation Commission  
Wrentham Town Hall  
79 South Street  
Wrentham, MA 02093

Reference: Review of Abbreviated Notice of Resource Area Delineation  
MassDEP File No. 351-1183  
280 Berry Street  
Wrentham, Massachusetts  
B+T Project No. 1399.138

Dear Mr. Immonen and Members of the Conservation Commission:

Beals and Thomas, Inc. (B+T) has provide the Wrentham Conservation Commission (the Commission) with a peer review of the Abbreviated Notice of Resource Area Delineation (ANRAD) for 280 Berry Street in Wrentham, Massachusetts ('the Property'). This review was dated December 8, 2022. The comments provided in this review have been listed below and United Consultants, Inc. responses follow each comment and have been italicized.

**Application Comments**

1. There appears to be a discrepancy between the total linear feet of BVW reported for confirmation in the WPA Form 4A and the numbers reported on the Plan. Specifically, Page two of four of the WPA Form reports two different numbers for BVW confirmation. Specifically, in Section B.1, 3,527 linear feet of BVW are reported for confirmation whereas in Section B.3, 2,154 linear feet of BVW are reported for confirmation. Whichever is the accurate numeric value should be listed in Section B.1 whereas Section B.3 is reserved for other resource area types that are requested to be confirmed. We note for the record that the linear foot takeoff displayed on the site plan reports 2,153 linear feet of BVW for confirmation.  
*The wetland resource areas types and linear footages have been revised on the plan as well as the ANORAD. (Pages 1 and 2)*
2. With respect to resource areas indicated on WPA Form 4A, we request that the linear feet takeoffs be refined to reflect the category of resource areas for which the Applicant is seeking confirmation. Specifically, there are three categories of resource area delineations referenced in the AES report, including Bordering Vegetated Wetland (BVW), Isolated Vegetated Wetland (IVW), and Bank. As it stands, the WPA Form 4A and Plans appear to present the entire delineation as BVW, however, other resource areas are delineated by the field flagging. We request that the Applicant itemize the linear feet of each resource type and label the various resource area types on the WPA Form and plans. It is critical to differentiate the resource area

categories because IVWs are not jurisdictional under the WPA and Bank has different performance standards than BVW. We also request that the Applicant confirm whether Isolated Land Subject to Flooding is on-site or advise if it is excluded from this ANRAD.

*The wetland resource areas types and linear footages have been revised on the plan as well as the ANORAD. (Pages 1 and 2)*

3. When updating the WPA Form 4A, we recommend that reference to the Bylaw be included in accordance with Section 4 of the Bylaw's implementing regulations, which states that Applicants should indicate under the heading of the first page of each form that the application is also filed under the terms of the Wrentham Wetlands Protection Bylaw.

*The application has been revised by adding the Wrentham Wetlands Protection Bylaw. (Page 1)*

### **Wetland Delineation Field Review**

1. With respect to the northwesternmost BVW flagging (AES Flags 154 through 159) it appeared that portions of the line were conservatively flagged (specifically flags 156 through 158) based on the transition of sweet pepperbush (*Clethra alnifolia*) into the oak and pine canopy, whereas hydric soils and indicators of hydrology appeared further downslope from the flagging by approximately ten to twenty feet. This apparent conservative delineation creates more jurisdictional area, and we do not take exception to it unless future wetland replication is proposed adjacent to this wetland, in which case it would be beneficial for the wetland flagging to follow the hydrologic and hydric soil indicators. The Commission may want to note this in the ORAD.

*The wetland delineation was based on vegetation. The applicant would be amenable to a notation in the ORAD as suggested.*

2. The AES report notes that a Certified Vernal Pool (CVP) is mapped by NHESP in IVW No.1 (Flags 1 through 15), and potential vernal pools are also mapped within BVW No. 1 and IVW No. 4. In addition to the NHESP-mapped vernal pools, B+T observed hydrology that is potentially indicative of vernal pools in two areas: specifically downgradient of flags 154 through 158 and downgradient of Flags 175 through 182. Observations during the spring breeding season would be required to evaluate if these areas function as vernal pool habitat.

*The various vernal pools are not reflected on the plans, and should be added, or the Applicant should advise if their intent is to exclude confirmation of vernal pools. Vernal pools, including potential vernal pools, are locally jurisdictional resource areas.*

*The extents of the high water have been added to the certified and potential vernal pool areas. (Flags HW1 to HW16, HW17 to HW40, HW41 to HW45, HW46 to HW54 and HW-A to HW-E)*

3. The AES report references IVW No. 4, but it is unclear where this is on the plans based on flag series. We request that the plan be updated to correspond with the AES report and to label resource areas as indicated therein, or to clarify if otherwise.

*The IVW and BVW area labels have been added to the plans.*

4. There appears to be upland soil conditions and a lack of indicators of hydrology downgradient of AES Flags 177 and 178. Therefore, we recommend that the Applicant remove AES Flags 177 and 178 from the sequence and connect AES Flag 176 to Flag 179. Unlike the wetland discussed in our Comment No. 1 which would require additional flagging/re-delineation if the Applicant wishes to bring the line downgradient, this area can be simply addressed by removing the noted flags.

*Flags AES 177 and AES 178 have been eliminated and the wetland line was adjusted by connecting Flag AES176 to Flag AES 179. The buffer zones were also revised.*

5. Two flags labeled 126 AES were found in the field. Given the location and missing 127 AES flag, we presume that the easternmost 126 AES flag was a duplicate and is intended to represent the 127 AES flag in the field. If an ORAD is issued for the Property, we recommend that the Commission consider a condition that this mislabeling be corrected in the field.  
*The flag has been labeled AES 127.*
  
6. There appears to be an upland cart path which passes over the intermittent stream associated with BVW No. 1. Specifically, this path appears to pass between Flags 58 AES and 59 AES and continue south between the duplicate 126 AES flags. Although the presence of a culvert was not readily apparent during our field review, there appears to be some subsurface connection between the portions of Bank which are bifurcated by this path. We recommend that the flagging depicted on the plan in this area be revised to account for the upland path.  
*Based on field observation, water was observed to be flowing over the path in the area of Flags AES 58 and 58 which provided a surface connection of the wetland areas. Based on this the flagging was not revised.*
  
7. With respect to IVW No. 1 (Flags 1 through 15), only the southerly semi-circle of this IVW has been delineated. If an ORAD is issued confirming the wetland line, we recommend that the Commission consider a finding noting that the approximately northerly half of this resource area is not confirmed.  
*The applicant is amenable to this finding.*
  
8. Based on the various submission guidance documents and our past experience reviewing ANRADs in Wrentham, we understand that the Commission typically requires two separate plans; one depicting state jurisdictional resource areas and one depicting local jurisdictional resource areas.  
*The plan depicts both the state jurisdictional and the local jurisdictional resource areas.*

We look forward to discussing this project further with the Conservation Commission at our next hearing.

Thank You in Advance,



Richard Goodreau  
Project Manger