

June 25, 2020

Ms. Linda Avis Scott, Clerk
Shutesbury Conservation Commission
Town Hall
P.O. Box 276
1 Cooleyville Road
Shutesbury, MA 01072

Re: Abbreviated Notice of Resource Area Delineation (ANRAD)
Pratt Corner Road East
Shutesbury, MA
(Parcel ID ZG-2)
DEP File # 286-0276
Wetland Consultant Peer Review-Supplemental Review Comments

Dear Ms. Scott and Commissioners:

Per request, Stockman Associates LLC has performed a wetland consultant peer review of the revised site plans for the Abbreviated Notice of Resource Area Delineation (ANRAD) submitted by TRC Companies on behalf of their client, W.D. Cows, Inc., for the review of delineated resource area boundaries located within a specific study area of the property located off Pratt Corner Road (Parcel ID ZG-2) in Shutesbury, MA.

Materials Reviewed

- Site Plans "*Delineated Resources Map Pratt Corner Road East Project Franklin County, MA*" prepared by TRC Companies (Sheets 1 through 10) Attachment D of the December 2019 ANRAD submittal. Revised date 4/30/2020 and subsequent revision date 5/10/2020.

Site Visit

- On May 6, 2020, a site visit was made by Ms. Emily Stockman (Stockman Associates LLC), and Mr. Greg Russo (TRC) to review the revised delineated resource areas presented on the 4/30/2020 site plans.

Review Comments

- 1) The revised plan set (May 10, 2020) depicts wetlands W-GR-1 and W-GR-2. Throughout the process, the original wetland systems W-GR-1 and W-GR-2 were determined to be connected, thus changing the entire southeasterly BVW to W-GR-1. The newly identified isolated wetland within the central portion of the site is now labelled as W-GR-2. Based on field observations, wetlands have been relabeled on the plan set, but not all flagging has not been updated in the field.

- 2) The Commission should be aware that sections of the revised flagging are no longer consecutively numbered. Therefore, review in the field is challenging (if not impossible) without the site plan, which may add complications to further applications.
- 3) Flag 4.6 for wetland W-GR-1 is not connected to the boundary line. (Page 10 of 10)
- 4) The term "*Stream Flag*" in the legend should be amended to reflect that the flagging demarcates the inland Bank (resource area) of stream.
- 5) The term "*Delineated Intermittent Stream*" in the legend should be amended to reflect the resource area boundary, inland Bank.
- 6) The Town of Shutesbury, Massachusetts Regulations under the General Wetlands Protection Bylaw define an isolated wetland (SECTION III.E.) as "*Isolated Wetland*" shall be defined as any area of one thousand square feet or more which meets all standards for vegetated wetlands under state law or regulations, except for the "bordering" requirement."

W-GR-2 is an isolated wetland subject to protection under The Town of Shutesbury, Massachusetts Regulations under the General Wetlands Protection Bylaw.

Calculations should be provided to determine whether any of the isolated wetlands also meet the criteria for protection as Isolated Land Subject to Flooding under the MA WPA.

310 CMR 10.57(2)(b)1. states, "*Isolated Land Subject to Flooding is an isolated depression or closed basin without an inlet or an outlet. It is an area which at least once a year confines standing water to a volume of at least ¼ acre-feet and to an average depth of at least six inches.*"

- 7) For clarity, the applicant and Commission should consider a different line type/polygon for isolated versus bordering wetlands.
- 8) Note #2 should be updated to reflect all delineation dates.
- 9) The final plan set should clearly state the final revision date for citation on the ORAD.
- 10) The delineation report states that handheld GPS data was post-processed to achieve sub-meter accuracy. The Commission may request supporting documentation regarding the GPS accuracy to ensure that all plans accurately describe the site and the resource area boundaries. Inaccuracies with sub-meter GPS mapping has presented issues with previous projects.
- 11) Based on MassGIS, the study area is located within a mapped Outstanding Resource Water. More specifically, the area is mapped as a Public Water Supply Watershed associated with the Atkins Reservoir (ID# 1008000-01S).
- 12) The revised site plans depict new data plots. Additional Wetland Determination Data Forms have not been submitted at this time and, therefore, have not been reviewed. The Commission should notify TRC, if the Commission is requiring updated forms.
- 13) Per the Town of Shutesbury, Massachusetts General Wetlands Protection areas subject to protection under the bylaw include:

- a. any freshwater wetland, isolated wetland, marsh, wet meadow, bog or swamp; within 100 feet of any freshwater wetland, isolated wetland, marsh, wet meadow, bog or swamp;
- b. any lake, river, pond or stream (whether surface or subsurface); within 100 feet of any lake, river, pond or stream (whether surface or subsurface); any land under said waters;
- c. any land subject to flooding or inundation by groundwater, surface water, storm flowage, or within a 100-year flood plain.

For review and approval under the local bylaw, the site plans should be revised to depict the boundary of the resource areas stated above.

I trust that the above comments will assist the Commission in their review of the previously referenced ANRAD application. Please do not hesitate to contact me with any questions.

Sincerely,



Emily Stockman, M.S., P.W.S.
Senior Scientist/Principal
Stockman Associates LLC

