

June 15, 2022

Ms. Miriam DeFant, Chair
Shutesbury Conservation Commission
Town Hall
P.O. Box 276
1 Cooleyville Road
Shutesbury, MA 01072

Re: RESUBMITTED Abbreviated Notice of Resource Area Delineation (ANRAD)
Montague Road Project
Carver Road West
Shutesbury, MA
(Parcel ID ZD-37)
DEP File # 286-0285
Wetland Consultant Peer Review-Supplemental II

Dear Ms. DeFant and Commissioners:

Per request, Stockman Associates LLC has performed a wetland consultant peer review of the revised materials submitted under the RESUBMITTED Abbreviated Notice of Resource Area Delineation (ANRAD) prepared by TRC Companies on behalf of their client, W.D. Cows, Inc., for the review of delineated resource area boundaries located within an expanded specific study area of the property located off Montague Road (Parcel ID ZD-37) in Shutesbury, MA.

Materials Reviewed

- "Table 1: Isolated Land Subject to Flooding (ILSF) Qualification Calculations Montague Road Project" prepared by TRC Companies Updated June 9, 2022
- Site Plan "*Delineated Resources Map Montague Road Project Franklin County, MA*" prepared by TRC Companies (Pages 1 through 38) REVISION date May 18, 2022

Site Visit

- On May 5, 2022, Ms. Emily Stockman (Stockman Associates LLC) and Mr. Greg Russo (TRC) made a site visit to review the delineated Bordering Vegetated Wetland (BVW) boundary on the abutting property to the north (Page 4 of 38), the W-GR-2 BVW boundary previously delineated by flags 155-164 and 105-164 and evidence of flooding within W-GR-16 and W-GR-17.

Review Comments

- 1) Based on soils, vegetation and hydrology observed during the May 5, 2022 site visit, Stockman Associates concurs with the extended delineation of the W-MBF-10 boundary demarcated by flags 300-306 located on the abutting property to the north (Page 4 of 38).

- 2) Overall, the revised boundary of W-GR-2 demarcated by flags 106 through 135 (joins 164) depicted on pages 18, 23, and 24 reflects the boundary changes made by TRC and reviewed by Stockman Associates on May 5, 2022.
 - a. Note: Flagging depicted on Pages 23 and 24 is not consecutive. The flagging sequence from 116 to 123 should be reviewed by TRC to determine whether flags were mislabeled in the field or during post processing. The intent during the site review was to have consecutively numbered flagging.
- 3) The 100-FT Buffer Zone boundary associated with Flag 27 on Page 33 has been accurately adjusted.
- 4) Based on the updated June 9, 2022 ISLF calculations prepared by TRC, W-GR-17 meets the definition of Isolated Land Subject to Flooding under 310 CMR 10.57(2)(b)1. As previously discussed, the Commission should note that TRC calculations are based on direct observation and field measurements. 310 CMR 10.57(2)(b)3. states, *"The boundary of Isolated Land Subject to Flooding is the perimeter of the largest observed or recorded volume of water confined in said area."*

Based on the data provided by TRC and indicators of flooding observed during the May 5, 2022 site visit, Stockman Associates concurs with the TRC assessment that W-GR-17 meets the definition of ILSF.

Based on the data provided by TRC and indicators of flooding observed during the May 5, 2022 site visit, Stockman Associates concurs with the TRC assessment that W-MBF-15 and W-GR-16 do not qualify as ILSF.

Should the Commission dispute the TRC determination for W-MBF-15 and/or W-GR-16, the Commission has the authority to require further assessment under 310 CMR 10.57(2)(b)3. which states, *"In the event of a conflict of opinion regarding the extent of water confined in an Isolated Land Subject to Flooding, the applicant may submit an opinion certified by a registered professional engineer, supported by engineering calculations, as to the probable extent of said water. Said calculations shall be prepared in accordance with the general requirements set forth in 310 CMR 10.57(2)(a)3.a. through c., except that the maximum extent of said water shall be based upon the total volume (rather than peak rate) of run-off from the drainage area contributing to the Isolated Land Subject to Flooding and shall be further based upon the assumption that there is no infiltration of said run-off into the soil within the Isolated Land Subject to Flooding."*

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

