

September 2, 2021

Ms. Penny Jaques, Interim Land Use 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 South
Shutesbury, MA
(Parcel IDs ZU-2, U-3, U-6 & ZT-3)
Wetland Consultant Peer Review

Dear Ms. Jaques 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 properties located off Pratt Corner Road (Parcel ID ZU-2, U-3, U-6 & ZT-3) in Shutesbury, MA.

Materials Reviewed

- ANRAD WPA Form 4A, "*Abbreviated Notice of Resource Area Delineation Pratt South Project Pratt Corner Road Shutesbury, Massachusetts*" and other supporting documents within the October 2020 ANRAD submittal prepared by TRC Companies.
- Site Plan "*Wetland Delineation Pratt South Project Shutesbury, Franklin County, MA*" prepared by TRC Companies (Sheets 1 through 23) Attachment D of the October 2020 ANRAD submittal. Updated April 6, 2021. Updated May 12, 2021
- Revised ANRAD submittal with increased study area and delineation dated August 2021. Pratt South Project Pratt Corner Road (Parcel IDs ZU-2, U-3, U-6 & ZT-3)
- Site Plan "*Wetland Delineation Pratt South Project Shutesbury, Franklin County, MA*" prepared by TRC Companies (Sheets 1 through 28). Updated June 11, 2021.

Site Visit

- On April 7, 2021, a site visit was made by Ms. Emily Stockman (Stockman Associates LLC), Ms. Maria Firstenberg (TRC) and Mr. Liam Cregan (Shutesbury Conservation Commission) to review delineated resource areas and the 92.6-acre study area. On May 24, 2021, a return site visit was made by Ms. Emily Stockman (Stockman Associates LLC) and Mr. Matt Regan (TRC) to review delineation adjustments and the revised study area.

Review Comments

- 1) The following adjustments were made by TRC during the April 7, 2021 site visit:
 - a. Flag 19 was removed from W-MJR-5, connecting flag 18 to 20 to demarcate the BVW boundary. This adjustment is not reflected on the latest June 11, 2021 revised plan set. (Page 8)
 - b. Flags 9 and 10 (W-MJR-5) were relocated to the west and east, respectively. These adjustments are reflected on the latest June 11, 2021 revised plan set. (Page 8)
 - c. Flag 146 (W-MJR-4) was adjusted to accurately demarcate the BVW boundary joining S-MJR-2 at flag 203. The latest revised site plan reflects the change, however, the label for flag 146 should be plotted near the flag point. (Page 10)
 - d. Flag 104 (S-MJR-2) was adjusted outward. This adjustment has been reflected on the latest revised site plan set. (Page 10)
 - e. Flags 137 through 140 and 120 through 122 (W-MJR-4) were adjusted by TRC. These adjustments have been reflected on the latest revised site plan set. (Page 15)
 - f. Flag 133 was removed (W-MJR-4), connecting flag 132 to 134 to demarcate the BVW boundary. This adjustment is not reflected on the latest June 11, 2021 revised plan set. (Page 15)
 - g. Flag 53 was removed (W-MJR-4), connecting flag 52 to 54 to demarcate the BVW boundary. This adjustment is not reflected on the latest June 11, 2021 revised plan set. (Page 16)
 - h. Flag 5 (W-MJR-2) was adjusted to the east and the northerly BVW boundary for W-MJR-1 was determined to be open along the project area. These adjustments have been reflected on the latest June 11, 2021 revised plan set. (Page 24)
 - i. The depicted open water area internal to wetland W-MJR-1 contains a combination of intermittent stream headwaters and inundated BVW. An open boundary should be depicted between flags 109 and 17. (Page 24)
- 2) During the April 7, 2021 site visit, egg masses of obligate vernal pool species were observed within W-MJR-3 and W-MJR-1. The abundance of egg masses (Wood Frog, Spotted Salamander) was sufficient to meet MA NHESP certification requirements. The site plans should be revised to illustrate the vernal pools within these delineated BVWs. The Commission should include a finding clearly stating the presence of vernal pools within W-MJR-3 and W-MJR-1. MA NHESP mapping indicates a potential vernal pool (PVP 22990) which coincides with the observations made within the W-MJR-3 BVW.
- 3) The following adjustments were made by TRC during the May 24, 2021 site visit:
 - a. Isolated Wetland W-MJR-7 was identified and delineated. This adjustment is reflected on the latest June 11, 2021 revised plan set. (Page 4)

- b. Dean Brook was observed flowing to the east of S-MJR-2. The project area has been revised to exclude this reach of Dean Brook from review. (Page 7)
 - c. Flags 332, 432, 322, 422, 310, 402, 309, 409 (S-MJR-2) were reviewed in the field and deemed accurate. However, plotting of the flags on Page 7 was inaccurate and has not been addressed on the latest June 11, 2021 revised plan set.
 - d. Flags 400 and 101 (S-MJR-2) were adjusted in the field. This adjustment is reflected on the latest June 11, 2021 revised plan set. (Page 10)
 - e. Flag 214 (S-MJR-2) was reviewed in the field and deemed accurate. However, plotting of the flag on Page 10 was inaccurate and has not been addressed on the latest June 11, 2021 revised plan set.
 - f. Flag 113 (S-MJR-2) was removed, connecting flag 107 to 114. This adjustment is not reflected on the latest June 11, 2021 revised plan set. (Page 10)
 - g. The revised stream flagging depicted on Pages 10 and 15 should be reviewed and corrected. An intermittent tributary stream was observed and delineated by TRC on May 24, 2021. The current revised plan does not accurately depict the intermittent tributary stream (which originates within the W-MJR-4 wetland). Field notes indicate that the intermittent tributary stream is demarcated by flags 101 to 107 and 201 to 207. The confluence between perennial stream S-MJR-2 and the intermittent tributary occurs at flags 107 and 207. The intermittent tributary stream is inaccurately labeled as S-MJR-2.
 - h. Flag 126.1 was added to S-MJR-2. This adjustment is not reflected on the latest June 11, 2021 revised plan set. (Page 15)
 - i. Added flag 223.1 (S-MJR-2) does not appear to be accurately plotted on the latest June 11, 2021 revised site plan. (Page 15).
 - j. Flags 137, 237, 136, 236, 225, 223 and 118 (S-MJR-2) were adjusted in the field. These adjustments are not reflected on the latest June 11, 2021 revised plan set. (Page 15 and 16)
 - k. Flags 143 through 146 and 243 through 246 were added to S-MJR-2. This adjustment is reflected on the latest June 11, 2021 revised plan set. There is an error with the label for flag 245. There are two flags labelled 244. (Page 16)
 - l. There is no flag point associated with the added label 134.1 (S-MJR-2). Field notes indicate that flag 135.1 was added. (Page 16)
- 4) The title block for Pages 2 through 28 should be corrected to state Page "X" out of 28 (not 23). There are 28 pages to the revised site plan set.
- 5) The final plan set should clearly state the final revision date for citation on the ORAD.
- 6) The Wetland Delineation Data Forms were reviewed. While I do not concur with all data presented on the forms (designation of *Tsuga canadensis* as FACU, incomplete soil profile descriptions, etc.) based on observations made during the site visits, the revised wetland boundaries proximal to the data transects are accurate.

- 7) Dean Brook is a designated Coldwater Fisheries Resource (CFR #3419600).
- 8) 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).
- 9) 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-MJR-6 and W-MJR-7 are isolated wetlands subject to protection under The Town of Shutesbury, Massachusetts Regulations under the General Wetlands Protection Bylaw.

- 10) The delineation report and revised plan set state 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) 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

