



January 15, 2026

Town of Ashland Conservation Commission  
c/o Becca Soloman, Conservation Agent  
101 Main Street  
Ashland, MA 01721

Via: Email to [bsolomon@ashland.com](mailto:bsolomon@ashland.com)

Reference: Peer Review- Notice of Intent (NOI)  
MassDEP File No. 095-1016  
The Residences at Ashland Crossing  
61 Waverly Street  
Ashland, Massachusetts  
B+T Project No. 3646.00

Dear Commissioners:

Beals and Thomas, Inc. (B+T) is pleased to assist the Town of Ashland Conservation Commission (the Commission) with its review of a Notice of Intent (NOI) for the proposed Residences at Ashland Crossing (the Project) located at 61 Waverly Street, on Assessors Map 15-012-00-000 (the Site or Property), filed by The Gutierrez Company (the Applicant). The Project entails the construction of a 226-unit residential Chapter 40B development.

We have reviewed the documentation submitted by the Applicant with respect to the requirements of the Massachusetts Wetlands Protection Act, MGL c.131, §40 and Regulations, 310 CMR 10.00 (collectively referred to as the Act); the Town of Ashland Wetlands Protection Bylaw and associated regulations (Section 280 of the Ashland Town Code); and the Massachusetts Erosion and Sedimentation Controls Guidebook.

Per the Commission's direction, B+T's scope did not include compliance with the Massachusetts Stormwater Management Regulations and associated Handbook and review of erosion controls was limited to potential impacts to adjacent resource areas. We understand that stormwater management review is being performed separately by another consultant, GCG Associates.

Additionally, our review of the wetland delineation was limited to three specific locations pursuant to a December 2, 2025 email from the Ashland Conservation Agent.

We understand that the Applicant will be providing supplemental site plans and information based upon the revised wetland line at the northern end of the site that will affect the limit of work line and off-grading in that location. Please note that supplemental review was not included in the Commission's Request for Proposals, and we would be happy to provide a proposal to review the forthcoming responses to comments and revised materials.

**Corporate Office**

144 Turnpike Road  
Southborough, MA 01772

[bealsandthomas.com](http://bealsandthomas.com) T 508.366.0560 F 508.366.4391

**Regional Office**

32 Court Street  
Plymouth, MA 02360

B+T received the following documentation which served as the basis of this review:

- *Notice of Intent - The Residences at Ashland Crossing*, dated October 29, 2025, prepared by SMMA (221 pages)
- Site Plans, titled *The Residences at Ashland - 61 Waverly Street*, dated October 29, 2025, prepared by SMMA (16 sheets)
- *Supplemental Wetland Border Report*, dated December 19, 2025, prepared by Goddard Consulting, LLC (2 pages)
- Wetland Determination Forms, dated December 2, 2025 (16 pages)

### **Project Summary**

The Project involves the construction of a five-story multi-family residential building with associated surface parking comprised of 392 spaces on an existing 15.9 acre Property. The majority of the Project is located outside the 100-foot buffer zone, with the eastern edge of the Project located in the buffer zone between the 100-foot buffer zone and the 25-foot no-disturb-zone. Areas of the Project within the buffer zone generally consist of off-grading slopes, and part of a stormwater basin along the northeast portion of the Property. Another small area of buffer zone is present at the southeast corner of the development area.



*Aerial photograph of the Site and vicinity with MassMapper Parcel Layer*

### **Site Visit and Delineation Review**

B+T conducted a site visit on January 13, 2026, to familiarize ourselves with the Site and adjacent area, to evaluate the existing conditions relative to the proposed development, and to review the wetland resource area delineation. Present on-site for this field review was Andrew Gorman of B+T on behalf of the Town. Photographs are included herein to illustrate conditions at the Site and to provide context for our comments.

Please note that B+T's field review was exclusive to three specific areas of the delineated resource areas pursuant to a December 2, 2025 email from the Ashland Conservation Agent noting: *The wetlands delineation being reviewed would be limited to two areas that the applicant will be providing DEP Wetlands Delineation forms for, as well as the area on the northmost property line abutting 63-65 Waverly Street where the stream is delineated coming out of the wetlands; rather than reviewing the entire eastern line of the wetlands.*

### **MassDEP Technical Review Comments**

The Massachusetts Department of Environmental Protection (MassDEP) has provided the following comments for the Commission's consideration. We have listed these comments for reference along with our written commentary.

1. *A rigorous erosion control plan, including temporary and permanent slope stabilization with coir mats or equivalent is needed, especially near wetlands where proposed slope ends immediately adjacent to Limit of Work. Stabilization mats with monofilament should not be allowed, even if "UV degradable".*

B+T Comment: We recommend that the applicant provide additional slope stabilization measures as indicated by MassDEP.

2. *Final plantings on steep slopes should include deeply-rooted native grasses, which will help ensure long-term stabilization.*

B+T Comment: We recommend that the planting plan be revised to include species in accordance with MassDEP's recommendations.

3. *Snow storage areas must be away from stormwater BMPs such as catch basins. Applicant must demonstrate at least 2' separation between top of ESHW and bottom on all infiltration units. If less than 3' separation, a groundwater mounding analysis is required.*

B+T Comment: We recommend that the Applicant issue written responses addressing MassDEP's comments related to snow storage and separation to estimated seasonal high groundwater. We understand that the stormwater management design and documentation for the Project are being reviewed by GCG Associates.

4. *Other MassDEP technical comments appear to have been addressed in the comment memo from Ashland Conservation Administrator, including that there may be absolutely no (0.00000000000) increase in stormwater discharge after construction.*

B+T Comment: We understand that the stormwater management design and documentation for the Project are being reviewed by GCG Associates.

#### **NOI and Field Review Comments**

5. With respect to the northerly stream leaving the BVW/Potential Vernal Pool (PVP), a solid blue flag labeled BF-S4A has been placed between Flags GCS#5 and GCS#4. We recommend that the Applicant connect the Bank line between these two GC flags to capture the subtle shift in topography along the Bank proximate to the stream's outlet.



*View facing east of stream with flag name annotation*

6. We recommend eliminating flag GCA#46 and replacing it with solid blue flag labeled WF-A46R, connecting to the same flags in alphanumeric sequence. This will encompass an area of hydric soils and hydrophytic vegetation such as red maple (*Acer rubrum*), silky dogwood (*Cornus amomum*), highbush blueberry (*Vaccinium corymbosum*) and remnant (winter conditions) royal fern (*Osmunda spectabilis*).



*Left Photograph: Auger pull up-gradient of GCA#46. Right Photograph: View of recommended revised flag location (image left)*

7. With respect to the area surrounding GCA#35, we recommend replacing the connecting flag GCA#36 with solid blue flag labeled WF-A36R hung in the field. This revision is recommended to capture hydric soil conditions (depleted soil matrix with redoximorphic features) and hydrophytic vegetation, such as remnant royal fern (*Osmunda spectabilis*).



*Sample soil conditions up-gradient of original delineation*



*View of revised WF-A36R facing northeast*

8. Given that B+T was tasked with reviewing only discreet sections of the delineated resource areas, if the remainder of the delineation constraining the Project were not reviewed by others, we recommend that the Commission specify in any Order of Conditions, that only those reviewed portions of the delineation are confirmed.

#### **Plan Comments**

9. The Site Preparation Plan (Sheet C-111) includes various callouts for 'Temporary Drainage Swale with Haybale Erosion Check Dam', which correspond with the accompanying E5 detail on Sheet C-501. For the check dams, we recommend that straw bales be used in lieu of hay to prevent the spread of invasive and undesirable plants through seeds often in haybales, and request the Applicant update the plan callouts and details accordingly.
10. In many areas, the limit of work is situated immediately adjacent to the 25-foot No Disturb Zone. We recommend that the Applicant consider whether or not they anticipate any disturbances within this No Disturb Zone, especially when it comes to achieving the necessary off-grading for stormwater infrastructure.

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B+T is available to attend the public hearing, upon request, to present the results of our review and be available for discussion regarding the comments listed herein.

Thank you for the opportunity to assist the Town of Ashland with the review of this NOI. Should you have any questions, please do not hesitate to contact our office.

Sincerely,

BEALS AND THOMAS, INC.



Andrew Gorman, CESSWI  
Senior Environmental Planning Specialist



Jeffrey R. Murphy, PE  
Civil Engineer

cc: Sophia Chrisafideis, Conservation Assistant, Town of Ashland  
(via email to [schrisafideis@ashlandmass.com](mailto:schrisafideis@ashlandmass.com))

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