

01/23/2026

Ashland Conservation Commission  
Greg Wands - Chair  
101 Main Street  
Ashland, MA 01721**61 Waverly Street Comprehensive Permit / 24142****RE: Comment Letter Responses**

Dear Mr. Wands and members of the Commission:

SMMA in collaboration with Goddard Consulting ("Goddard") is pleased to provide this memorandum on behalf of the Applicant, The Gutierrez Company, to respond to the comments prepared by Beals and Thomas in their letter sent to the Applicant on January 15, 2026.

Beals and Thomas' original comments are below in black font followed by the responses in *blue italics*.

*Comment Responses***MassDEP Technical Review Comments**

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.

*Response: Drawing C-111: Site Preparation Plan is revised to include a note for the contractor to use coir erosion control mats on the slope adjacent to the wetland as required based on construction sequencing.*

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

*Response: The proposed seed mixtures adjacent to the wetland have been revised in accordance with the Conservation Agent'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.

*Response: Drawing C-131: Grading & Drainage Plan is revised to include the snow storage areas that are not located above drainage catch basins. At least 4-feet of separation is provided between the bottom of infiltration system for both SIS-1 and SIS-2 and ESHGW elevation. The Subsurface Infiltration System – 1 bottom of stone elevation is 226.50’ with an ESHGW anticipated to be at El. 218.00, or lower. The Subsurface Infiltration System – 2 bottom of stone elevation is 229.00’ with an ESHGW anticipated to be at El. 225.00, or lower.*

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 (0.0000000000) 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

*Response: The hydrology model has been revised to reflect comments from the stormwater peer reviewer, GCG Associates in line with DEP performance standard No.2. The enclosed Peak Discharge Rate Summary is updated to reflect the current hydrology model with comments from GCG Associates incorporated. There is no increase in peak discharge for the 2-year and 10-year 24-hour storm events for design points discharging to wetland resource areas (new DP-1, DP-2, and DP-3) and as such, the project meets this performance standard. Reducing the negligible increase for the 10-year 24-hour storm events to DP-4 and DP-5 (which do not discharge to a wetland resource area) would require clear-cutting approximately 33,000 square feet of existing tree and native vegetation that is proposed to remain as a buffer between the project and the adjacent residential property. Further, it would require blasting and trenching a pipe for approximately 800 linear feet through the property. This disturbance is neither beneficial to the environment, the neighbors, nor advances any WPA interests.*

#### **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

*Response: The wetland delineation plan has been revised to reflect the suggested flag changes.*

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*).

*Response: Goddard contests that the soils are hydric. The data provided does not prove the soils are hydric. The DEP data sheets provided by Goddard on 12/23/25 show that the soils do not meet the DEP definition of hydric soils.*

*Nevertheless, the Applicant will concede this change to the wetland delineation. The plans have been updated with the new wetland line and the project’s grading and limit of work have been revised accordingly to maintain no disturbance within the 25-foot Buffer Zone.*

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*).

*Response: Goddard contests that the soils are hydric. The data provided does not prove the soils are hydric. The DEP data sheets provided by Goddard on 12/23/25 show that the soils do not meet the DEP definition of hydric soils.*

*Nevertheless, the Applicant will concede this change to the wetland delineation. The plans have been updated with the new wetland line and the project's grading and limit of work have been revised accordingly to maintain no disturbance within the 25-foot Buffer Zone.*

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.

*Response: Prior to Beals and Thomas' engagement Members of the Commission and the Conservation Agent personally observed the project-side wetland delineation in the field. The only portions of the delineation for which the Commission had questions were those referred to Beals & Thomas for further review. As noted above, the Applicant has agreed to relocate the flags as requested. As such, all comments regarding the delineation have been addressed and the Applicant expects as is typical, that the delineation will be confirmed for all flags on the project side of the line.*

#### **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

*Response: Drawing C-111: Site Preparation Plan and details A3/C-501 and E5/C-501 are revised to reference strawbale only.*

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.

*Response: The limit of work and proposed grading directly abut the Town's 25-foot no-disturb buffer in only a few locations. There is additional space between the limit of work and the 25-foot no-disturb buffer for the majority of the development adjacent to the wetland. The 25-foot no-disturb buffer is clearly labeled on all drawings.*

Sincerely,



Will Park, PE

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*CC: The Gutierrez Company*

*Enclosures: Revised Wetland Flags Sketch*

*Updated Existing Conditions Plan*