Town of Ashland, *Office of Conservation*

DATE: January 27, 2026

Subject:
RE: 61 Waverly Street Comprehensive Permit / 24142 RE: Comment Letter Responses

Addressed To:
SMMA attn: Will Park
1000 Massachusetts Ave
Cambridge, MA 02138

CC: The Gutierrez Company

Dear Will Park,

Below please find my responses to the submitted response letter received on Friday, January 23, 2026.

In keeping the format of your letter, the original comments are below in black font followed by the applicant responses in *blue italics.* Response to the applicant response is in **black bold**.

General Comments

a. Plans need to show full length of culvert in road being connected into and other connections in the same line up to 90 Waverly Street.

Response: Drawing C-101: Existing Conditions Plan has been revised to 50-scale in order to show the surveyed swale behind the neighboring property, the stone box culvert beneath Waverly Street, and the 12" RCP pipe from the catch basin along Waverly Street to the stone box culvert.

No further comment

b. Roof Drain detail is not provided. Only Foundation Drain detail is provided.

Response: Detail A7: Downspout connection has been added to drawing C-502: Details II. The roof drain around the perimeter of the building and connected to the drainage network will be installed in accordance with detail C7/C-503: Trench Section – CPE Drains.

No further comment

c. Snow Storage areas are shown on the plans but do not show the catch basin and stormwater overlay with it. CBs should be shown to ensure snow storage is not placed over CBs.

Response: Drawing C-131: Grading & Drainage Plan is revised to show the snow storage areas which avoid the drainage catch basins.

No further comment

d. Dewatering plan has not been provided. Dewatering plan should be provided.

Response: Previous responses to comments from SMMA and Sanborn Head & Associates (SHA) describes how the limited surface bedrock removal is not anticipated to alter the groundwater flow patterns. The project Construction Documents will include the specification 31 23 19 Construction Dewatering that will require the contractor to submit a Dewatering Plan with drawings and supporting engineering calculations for the proposed surface water control and dewatering systems including locations, methods, sizing, equipment, power and standby power, etc.

The project will obtain coverage under 2022 NPDES Construction General Permit (CGP) that will require preparation of a Stormwater Pollution Prevention Plan (SWPPP) including project and site specific dewatering methods. Dewatering methods shall include, but are not limited to:

- *pumping through silt bags,*
- *pumping to temporary sediment basins,*
- *adding flocculant to basins if needed to accelerate settlement, and*
- *use of frac tanks if needed for additional storage for settlement.*

The Applicant will submit the Dewatering Plan, SWPPP and proof of NPDES CGP coverage to the Town prior to construction.

The Conservation Commission has a precedent to require a dewatering plan as part of the NOI process to ensure that the proposal will not impact the wetlands on the site, or existing stormwater features. There may sometimes be a condition that any minor changes to the plan may be approved by the Conservation Agent if needed, provided that the Commission is updated within a reasonable time. A complete dewatering plan should still be provided for the Commission to review and approve.

e. Wetlands delineation was completed in November 2024. At this time the State had declared a drought status. As noted by the Commission, November would have minimal to no ground cover. Drought conditions may also have resulted in lower-than-normal water conditions. Commission requesting further review on site - further comments pending.

Response: The delineation was conducted in accordance with the "Delineation Handbook", Second Edition, published by DEP in September 2022, which includes methods for delineating wetlands even in drought conditions. The wetland delineation was based on vegetation and soils, both not impacted by drought conditions, to determine vegetation density and hydric soil conditions, even when soils aren't saturated. Most wetlands dry up in the summer and can still be accurately delineated under those conditions and drought. Lastly, even in the fall, herbaceous vegetation can be identified by dormant stems. The delineation has been updated to incorporate revisions requested by Beals and Thomas.

No further comment

f. Elevation for the bottom of the surface basin on grading and drainage plan is shown as 130 feet. The Exploration Location Plan shows 227.5 feet. Please clarify which is the correct elevation.

Response: The surface basin has been revised from a surface infiltration basin to a surface detention basin with a bottom elevation of 225.5 feet.

No further comment

Sheet C-111 Comments

g. Some presumed temporary drainage swales are missing labels.

Response: Drawing C-111: Site Preparation Plan is revised to label all temporary drainage swales.

No further comment

h. Inconsistencies between "haybale" and "strawbale". Should be strawbale only.

Response: Drawing C-111: Site Preparation Plan is revised to reference strawbale only.

No further comment

i. CBs should be numbered, including those in roadway, for differentiation in discussions.

Response: All drawings are revised to add labels to all existing catch basins adjacent to site according to street name or nomenclature provided by the Town.

No further comment

j. CB in Waverly Street proposed to connect into is shown at 12" PVC. Field observations by Conservation and DPW staff have found only 12" RCP.

- CB inverts should also be confirmed. Field observation does not support a 3-foot depth.

Response: All drawings are revised to show the existing drainage pipe as 12" RCP. SMMA performed a field measurement to confirm the rim-to-invert depth from the survey.

No further comment

k. CBs on Union Street are not shown with sediment/ silt bags. Silt bags should be added to all CBs within 100 feet of construction entrances.

Response: Drawing C-111: Site Preparation Plan is revised to add sediment/silt bags to nine catch basins along East Union Street.

No further comment

l. Soil stockpiles are shown without erosion control barriers. Erosion control should be shown in a perimeter around all stockpiles.

Response: Drawing C-111: Site Preparation Plan is revised to show perimeter erosion controls around soil stockpiles. The Contractor will be required to follow the SWPPP requirements regarding stockpiles.

Plan now calls for compost sock around all stockpiles, but references detail A7 on plan sheet C-501. This detail shows a compost sock for perimeter control of the site, and not for stockpile perimeter. The Commission typically requires some separation from the tow of slope on the stockpiles to the erosion controls to mitigate overtopping. Additionally, the Commission has typical standard conditions as to the accepted height, slope, and location of stockpiles, which will may be more restrictive than typical SWPPP requirements.

Please also confirm if the stockpiles will be present in these locations after completion of the stormwater features, as the Commission requires all stockpiles to be located more than 50-feet away from stormwater structures (namely catch basins, surface basins, and swales).

m. Drain pipe in the middle of the wetland is shown as PVC. While the northern pipe exiting the wetlands is known to be PVC, the pipe in the middle of the wetlands was observed by Conservation Staff and Commissioners during the MassHousing site visit to consist of stone or granite.

Response: SMMA observed the pipe in the middle of the wetlands to be PVC with manmade stone headwalls, presumably to help with heaving. The material of the pipe at this location has no bearing on the project.

No further comment

n. Several CBs are shown from the proposed drainage plan with call-outs for silt bags. This sheet is site preparation and the CBs in these areas do not exist yet. If the proposal is to install CBS before the rest of site work, then all CB's shown should have silt bags called out.

Response: Drawing C-111: Site Preparation Plan is revised to remove proposed catch basins and associated silt bags. General Erosion Control Note #5 has been added to install silt bags as the proposed catch basins are installed.

No further comment

Sheet C-121 Comments

o. Differences in curb symbology is not clear on the plan due to small size, please differentiate with either larger or differing (such as dashed lines) symbology.

- Curbing on the edge of pavement closest to the wetlands should be confirmed.

Response: Drawing C-121: Layout & Materials Plan is revised to more clearly define curb types. The curbing adjacent to the wetland is precast concrete curb with standard 6-inch reveal.

No further comment

p. Single wetland area sign proposed in middle of BVW length at toe of slope. It would be more effective to have multiple markers adhered to the proposed 4-foot fence at the top of slope. Suggested sign to read "Protected Wetland Area. No Dumping.".

- No dumping signs should be added on the fence line near the trash receptacle in this area regardless.

Response: Drawing C-121: Layout & Materials is revised to include five (5) wetland notification signs along the 4 ft high chain link fence spaced 50 feet apart. The wetland notification signage is included on the signage schedule provided on drawing C-505: Details V.

No further comment

q. See also comment 2-d.

Response: Refer to response above.

Sheet C-131 Comments

r. Foundation and Roof Drain symbology is identical and overlapping. These should be differentiated more clearly.

Response: Drawing C-131: Grading & Drainage Plan is revised to more clearly define the roof drains and foundation drains around the perimeter of the building and how they connect to the drainage system or daylight at the perimeter of the development.

No further comment

s. Drain from either foundation or roof on the easterly corner has an outlet with an FES pointed towards the wetland part way on the slope, with no riprap or other mitigation. No treatment is provided. This should be corrected on the plans.

Response: Drawing C-131: Grading & Drainage Plan is revised to clearly show the foundation drain (FD) discharging to the perimeter of the development. Rip-rap outlet protection has been added beyond the flared end section (FES). The foundation drain collects any groundwater that may be present and discharges towards to the wetlands to help replenish the wetland. Treatment of the re-routed groundwater is not required.

No further comment

t. Emergency Spillway for surface basin is pointed towards wetland with no riprap or other mitigation called out on plan. Riprap or other form of protection should be added to mitigate erosion.

Response: Drawing C-131: Grading & Drainage Plan is revised to provide rip-rap protection on the emergency spillway. Rip-rap sizing calculations are provided in the enclosed materials.

No further comment

u. See also comment 2-d.

Response: Refer to response above.

Town of Ashland, *Office of Conservation*

Sheet C-141 Comments

a. See previous comments.

Response: Refer to responses above.

Sheet C-151 Comments

a. Not ConCom related- Pinus Strobus proposed in ROW for Union Street should be changed. Species is self-pruning and presents substantial hazard to the roadway as trees mature.

- Additionally, trees are under powerlines. All trees under or near powerlines should be less than 35-feet (optimal), 40-feet (acceptable) in height to prevent interference with powerlines as trees mature (this also applies to proposed maples and oaks). Recommended substitution for dwarf species, or alternative short species (e.g., redbud, crabapples, serviceberry, dwarf maples, striped maples, etc. || or alternatives, spire or columnar cultivars with minimal spread, set back from the powerlines.

Response: Pinus strobus have either been relocated or substituted to address concerns along Waverly Street and East Union Street. Large trees have either been moved or substituted with small tree species within 50' of the power lines on both Waverly Street and East Union Street.

No further comment

b. Lawn area/ lawn mix proposed for slopes facing wetland in buffer zone. Recommended native wildlife seed mix (optimal), native erosion control mix (acceptable) to minimize spread of non-native and invasive fescues and grasses, and to mitigate impact to wildlife habitat cause by the development.
Response: The seed mix in the buffer zone has been updated to be New England Wildlife seed mix.

No further comment

c. Surface basin is called out to have New England Wet Mix, but symbology is for New England Restoration Seed Mix- Dry. Symbology for New England Wet Mix does not appear on the plans.

Response: The hatch has been corrected to show the New England Wet Mix.

No further comment

d. Two honey locust species are proposed on the top of bank for the surface basin. Honey locust species drop their leaves all at once in the fall and frequently can cause clogging for CBs and drain pipes. Consider alternative species that will have less impact on long-term stormwater maintenance.

Response: Honey locusts have been moved or replaced with other tree species.

Honey Locusts appear to be replaced with Autumn Flame Red Maple. No further comment.

Town of Ashland, *Office of Conservation*

Sheet C-501 Comments

a. Detail E5 calls for haybales. This should be strawbales. Hay spreads invasive seed which can negatively impact the wetlands.

Response: Drawing C-501: Details I is revised to reference strawbale only.

No further comment

b. Detail C3 for construction fence should include an 8-inch minimum gap at the bottom of the fence from the ground to allow passage of amphibious or semi-aquatic species during migration periods from the vernal pool.

Response: Detail C3/C-501 is revised to provide an 8-inch gap at the bottom of the fence to allow passage of amphibious or semi-aquatic species.

No further comment

c. Detail A1 for rock construction entrance lists a 6" minimum depth. ConCom standard conditions are for 8-inch minimum depth. This should be corrected on the plan.

Response: Detail A1/C-501 is revised to provide 8-inch minimum depth construction entrance.

No further comment

Sheet C-502 Comments

No comments at current time.

Sheet C-503 Comments

a. Detail E5 see comment 7b.

Response: Detail E5/C-503 from the Notice of Intent drawings is now located at E5/C- 507 and is revised to provide an 8-inch gap at the bottom of the fence.

No further comment

Sheet C-504 Comments

No comments at current time.

Sheet C-505 Comments

No comments at current time.

101 Main Street Ashland MA 01721 | ashlandmass.com | 508-881-0100 Ext. 7906| schrisafideis@ashlandmass.com
508-881-0100 Ext. 7924| bsolomon@ashlandmass.com

Sheet C-506 Comments

No comments at current time.

Sheet C-507 Comments

No comments at current time.

Sheet ES100 Comments

No comments at current time.

WPA Form 3 and NOI Narrative

a. Under Section C.1.b Date of the NHESP map is not provided.

Response: The WPA Form 3 was prepared in October 2025 and referenced the 15th Edition of the Massachusetts Natural Heritage Atlas effective August 1, 2021, Estimated Habitat Map of State-Listed Rare Wetland Wildlife published by the Natural Heritage and Endangered Species Program.

Please provide the revised WPA form showing that date and submit it and any additionally revised documents and plans to MassDEP.

Stormwater Checklist and Report

a. Checklist marks "minimizing disturbance to existing trees and shrubs" as an LID measure; however, within the development work area no trees or shrubs are marked as being kept, and only new plantings are shown.

Response: The project was designed to preserve significant areas of existing woodland totaling nearly three (3) acres, the majority of which is located on the non-project side of the wetland system. Refer to previously submitted Figure: Limit of Disturbance.

No further comment

b. The existing hydrology map shows soil lines that appear to be based on the USGS estimates. While this is typically best practice, conditions should be confirmed in the field. Specifically, this map shows the Narragansett soil series within the wetlands on the property. This is highly unlikely to be accurate, as Narragansett soils are well-draining upland soils. A change in this line may result in a change in the calculations for infiltration on the site and should be further reviewed. The wetlands report provided by Goddard Consulting provides data on the soil conditions with color/ hue, texture, and depths of layers which should be suitable to guide some determination along the wetlands line as to

the soil type. Notably, the wetlands soils are noted in said report to have 10" of much for the O layer, with restrictive rock layer just beneath. This is inconsistent with the Narragansett soil series shown on the existing hydrology map. Any changes on this should also be shown on the proposed hydrology map.

Response: The hydrology model has been updated based on comments from GCG Associates regarding underlying soils and corresponding Hydrologic Soil Groups (HSG), along with input from SHA regarding the presence of shallow bedrock.

Provided materials state that the soil was reclassified to HSG A/D, but that HSG B was used in HydroCAd due to no HSG A/D option existing. Please clarify why HSG B was chosen as opposed to HSG C.

c. The Peak Discharge Rate Summary table shows DP-1 as having proposed peak discharge rates for the 2-year and 10-year 24-hour storms increased from predevelopment rates. The notes in the report state the "increases are equal to 0.0 cfs…. [and] is considered negligible". Neither 0.02 or 0.04 is equal to 0.0; and the Massachusetts Stormwater Handbook does not allow for any increases in peak discharge rate. The stormwater design must be modified so that the increase is equal or less than pre-development conditions.

Response: 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..

DP-4 and DP-5 discharge to the roadway drainage which outlets into the Sudbury River in front of the Ashland Public Safety Building, and therefore outlets to a wetlands resource area. Additionally, the applicant should verify with the Ashland DPW on the capacity of the roadway drainage to accept to an increase in stormwater.

As shown on the current table provided, there is an increase in DP-1 (to the Waverly Street culverts) consisting of 1.4cfs in the 100-year storm. Please provide the analysis required by to confirm off-site flooding will not occur. DP-2 has a similar increase of 0.88cfs and DP3 of 0.13cfs for a combines increase of 1.01cfs to the wetland resource area, which also flows to the Waverly Street culvert and would add to the increase there as well. Please provide the analysis required by the stormwater standards to confirm no off-site flooding.

d. The Peak Discharge Rate Summary table shows DP-3 as having proposed peak discharge rates for the 10-year 24-hour storms increased from pre-development rates. The notes in the report state the "increases are equal to 0.0 cfs…. [and] is considered negligible". 0.01 is not equal to 0.0; and the Massachusetts Stormwater Handbook does not allow for any

increases in peak discharge rate. The stormwater design must be modified so that the increase is equal or less than pre-development conditions.

Response: Refer to response above.

e. The Peak Discharge Rate Summary table shows DP-3 as having proposed peak discharge rates for the 100-year 24-hour storm increased from pre-development rates. The notes in the report state "the peak discharge rate increased by 0.10 cfs and will not increase the chance of off-site flooding". The Massachusetts Stormwater Handbook does not allow for any increases in peak discharge rate. The stormwater design must be modified so that the increase is equal or less than pre-development conditions.

Response: The Applicant respectfully disagrees with the assertion that the Massachusetts Stormwater Handbook categorically prohibits any increase in modeled peak discharge under the 100-year storm event. Stormwater Standard 2 requires that post-development peak discharge rates be evaluated and managed to prevent increased off-site flooding, and the Handbook specifically recognizes that attenuation of extreme storm events must be assessed in terms of potential downstream impacts rather than mathematical zero increase alone.

As stated in the Massachusetts Stormwater Handbook, proponents must evaluate peak discharges from the 100-year, 24-hour storm and provide BMPs to attenuate those discharges where such evaluation demonstrates that increased off-site flooding would result. Consistent with these requirements, the project's stormwater management system has been designed using BMPs to provide peak-rate attenuation and control discharge. The enclosed Peak Discharge Rate Summary shows proposed peak discharges between 0.25 cfs and 1.80 cfs for individual design points and a cumulative project increase of only 1.60 cfs for the 100-year 24-hour storm event. Importantly, the modeling demonstrates that these discharges do not result in increased off-site flooding and do not cause a material alteration of downstream drainage conditions. Accordingly, the project's stormwater system satisfies the intent and performance requirements of the Massachusetts Stormwater Management Standards.

Response claims the total increase for the entire site is only 1.60cfs; however, the table provided shows an increase across DP-1, DP-2, and DP-3 for a total of 2.39cfs (1.38cfs in SP-1; 0.88cfs in DP-2; and 0.13cfs in DP-3) increase in the 100-year storm. Please provide the analysis to show no off-site flooding will occur.

Other Stormwater Design

a. The surface basin does not appear to have an forebay.

Response: The pre-treatment to the surface basin is a water quality pre-treatment unit in lieu of a sediment forebay.

No further comment

b. There is no detail provided for the construction of the surface basin. The basin appears to have a bottom that is raised 2-3 feet above existing elevations. Details for the materials creating the bottom of the basin and sides should be provided to ensure functionality.

Response: Detail E1/C-504: Surface Detention Basin – 1 Section A-A has been added to show the existing and proposed grades, materials, and an impermeable clay membrane installed in the center of the berm to reduce the risk of erosion.

No further comment

c. There is no detail provided for the broad crested emergency spillway of the surface basin.

Response: Detail E5/C-503 is provided for the broad crested emergency spillway.

No further comment

d. There is no detail for the construction of perimeter walls / berm of the surface basin.

Response: Refer to response above.

No further comment

e. The soil test pit numbered SH-TP-101 located within the proposed bioretention area found seasonal high ground water at elevation 217.5 feet. The details for the bioretention area show the bioretention soil beginning at an elevation of 218 feet, with the perforated underdrain at approximately an approximately 2-foot depth beneath that (equivalent to an elevation of 216 feet), which would be within the estimated seasonally high ground water and could affect the drainage of the retention area.

Response: The bioretention area is revised to a subsurface detention system – refer to detail C5/C-504: Subsurface Detention System (Stormtech SC-310). The system bottom of system is at elevation 215.76 which is below the SH-TP-101 observed seasonal high ground water at elevation 217.5. Buoyancy calculations are enclosed that demonstrate a factor of safety against floatation of 6.0.

No further comment

f. The bioretention area is designed with soil media of a depth of 1'-4". Per the Massachusetts Stormwater Handbook Volume 2 Chapter 2 page 26, regarding design of bioretention areas: "the depth of the soil media must be between 2 and 4 feet." and "If there is a Total Maximum Daily Load that requires nitrogen to be removed from the stormwater discharges, the bioretention area should have a soil media with a depth of at least 30 inches, because nitrogen removal takes place 30 inches below the ground surface. If trees and shrubs are to be planted, the soil media should be at least 3 feet.". As currently designed, the bioretention area does not meet this design requirement.

- Additionally in Volume 2 chapter 2 of the Massachusetts Stormwater Handbook, page 26, it is stated: "When the bioretention area is designed to exfiltrate, the design must ensure vertical separation of at least 2 feet from the seasonal high groundwater table to

the bottom of the bioretention cell.". Please confirm if the bioretention area if the area is designed to exfiltrate in addition to travelling through the perforated underdrain. If exfiltrating, the basin must have a 2-foot separation to groundwater, which is not being met as designed.

Response: The bioretention area is revised to a subsurface detention system – refer to response above.

No further comment

Wetlands Report and Delineation

a. The Wetland Border Report states flagging was conducted using the criteria from the WPA and 310 CMR 10. But does not refer to the Massachusetts Handbook for Delineation of Bordering Vegetated Wetlands (hereafter referred to as "Delineation Handbook", Second Edition, published by DEP in September 2022, which must be met. Please revise the report to confirm that the requirements in this handbook have been met.

Response: The delineation was conducted in accordance with the "Delineation Handbook", Second Edition, published by DEP in September 2022. The supplemental WBR dated December 19, 2025 and submitted on December 23, 2025 provides updated references to what was used as part of the delineation.

No further comment

b. The Wetland Border Report does not list the delineation procedure used. Please detail how the delineation method complies with the Delineation Handbook, section 5.5.1 Delineation Procedures.

Response: The delineation was conducted in accordance with the "Delineation Handbook", Second Edition, published by DEP in September 2022. The supplemental WBR dated December 19, 2025, and submitted on December 23, 2025, provides updated references to the methods used for the delineation.

No further comment

c. Sample points provided for both the upland and wetland sample points appear to be near flag "GCA81" Only a "GCG" series appears on the plans. No flag with number 81 appears on the provided pre-existing conditions plans due to scaling, and appears to be on the wetland edge furthest from work activities. Sample point should be in an area near where the development activities are occurring.

Response: The supplemental WBR dated December 19, 2025 and submitted on December 23, 2025 provides two DEP data sheets for GC46 and GC36.

No further comment

d. The delineation form for the wetland sample point has sections cut off in the submission and should be resubmitted.

Response: The updated site plans show the flags from the delineation forms.

No further comment

e. Delineation forms should be provided for multiple points along the wetland edge closest to proposed development activities for both upland and wetland sides of the line, and meet the requirements of the Delineation Handbook Appendix B Assessing the Vegetative Community - Observation Plots. Please provide the additional delineation form for sample points along the western edge of the wetlands line (the development side of the wetland), as point on the eastern side (away from proposed development activities) is not enough to verify the wetland delineation.

Response: The supplemental WBR dated December 19, 2025 and submitted on December 23, 2025 provides two DEP data sheets for GC46 and GC36.

No further comment

Sincerely,
Becca Solomon
Ashland Conservation Agent