

Memorandum

To:	Greg Wands – Chair Ashland Conservation Commission	Project Number:	24142
From:	Will Park, PE	Date:	02/20/2026
Project Name:	61 Waverly Street		
RE:	Conservation Agent Email Comments		
Distribution:	The Gutierrez Company, Sanborn Head & Associates, Goddard Consulting		

SMMA in collaboration with Sanborn Head & Associates and Goddard Consulting is pleased to provide this memorandum on behalf of the Applicant, The Gutierrez Company, to respond to the comments prepared by the Conservation Agent in their emails dated 02/05/2026 and 02/09/2026.

Conservation Agent email dated February 5, 2026:

“In reviewing the materials more closely since the meeting, I’ve realized that one part of MassDEP’s comments has still not been fully responded to. Please make sure the below DEP comment is fully addressed. I have added clarification of what will be expected beneath the DEP comment:

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”.

- Please provide a complete erosion control plan that at minimum includes the measures as stated in the DEP comments. Erosion control blankets are shown in the details but do not appear to be called out in the plan. Some erosion controls are shown in the site preparation plan, but there is no dedicated erosion control plan sheet, which should be included. The applicant may consider phased clearing to avoid significant runoff down the hills. Additionally, DEP specifically commented that coir mats (coconut husk) or equivalent be used. Please make sure this is called out on the detail and the plan. Straw blankets will not be a suitable alternative to coir. Please make sure that the details specifically call out that monofilament is not to be used.”*

SMMA Response:

Sheet C-111 Site Preparation Plan is the dedicated erosion control plan. Soil stockpiles with compost sock protection and safety fencing if greater than 10-feet in height,

temporary drainage swales, temporary sedimentation basins, compost sock perimeter controls, silt fence perimeter controls, construction entrances, catch basin sediment bags, erosion control blanket provisions, protected areas including the 25-foot no-disturb, infiltration area footprints with sizing criteria, and conceptual construction sequencing are all specified on sheet C-111.

The erosion control blankets are called out on the erosion control plan sheet C-111 in General Erosion Control Note #9: “To provide slope stabilization, erosion control blankets (Detail C7 /C-501) shall be provided along slopes adjacent to the wetland 25-foot no disturb buffer zone as required based on construction sequencing”. This gives the contractor the option to use erosion control blankets if traditional loam and seed cannot provide stabilization as required in the SWPPP. Notes #5 and #6 on the erosion control blanket detail C7/C-501 specify that mats should be coir mats, or approved equal, and monofilament is not permitted.

Conservation Agent email dated February 9, 2026:

“After the discussion at the meeting last week regarding the water issues at other nearby sites, we were able to locate the photos from the most recent event the Commission referred to which occurred at 16 Union Street, the current Ashland Public Safety Building, which is just below the site.

Please find the attached photos and video below for reference of what the Commission is looking to avoid occurring on this site after blasting.”

SMMA Response:

The Applicant reviewed the photos and video provided of the runoff event that occurred during the construction of the Ashland Public Safety Building located at 12 Union Street. The Applicant acknowledges this heavy rainfall event likely exacerbated runoff issues from groundwater as previously described by the Conservation Commission.

Per a review of Massachusetts GIS data, the 12 Union Street site is located at a low point (approx. el. 187’ at west corner) that receives overflow from a ±2-acre wetland located to the east at approx. el. 218’ with a contributing drainage area of ±11-acres. This project site is therefore “cut” into the bottom of a hillside where groundwater would be assumed to be present.

It appears that the runoff event took place during a storm as rainfall is evident in the pictures and video. Runoff from the 12 Union Street construction site and adjacent wetland overflow would be directed to one low point located west of the 12 Union street site (where the significant off-site discharge occurred). This in combination with a rainfall event and poor stormwater management controls (apparent lack of drainage swales and temporary sedimentation basins per the pictures and video) resulted in the significant off-site discharge. No rock fractures are apparent from the provided photos and video.

By contrast, 61 Waverly Street is located at a high point and therefore does not receive any off-site runoff nor does it have groundwater that drains to the construction area. Unlike 12 Union Street, runoff from 61 Waverly Street does not flow to only one discharge point, but rather is dispersed across the north, east, and west perimeters of the site. During construction, runoff will be captured by temporary drainage swales and conveyed to properly sized sedimentation basins dispersed across the limit of disturbance.

As described previously, the 61 Waverly Street project does not anticipate bedrock removal that will result in additional exposed bedrock slopes or altered groundwater flow.

As such, the 61 Waverly Street site does not present the unique runoff challenges that were present at the 12 Union Street site, and the Applicant will implement effective erosion control measures (as detailed in the plans and notes) to prevent off-site discharge, even during a significant storm event.