



EcoTec, Inc.

ENVIRONMENTAL CONSULTING SERVICES
102 Grove Street
Worcester, MA 01605-2629
508-752-9666 / Fax: 508-752-9494

MEMORANDUM

Date: November 17, 2022

To: Grafton Conservation Commission

From: Arthur Allen

Re: Peer Review for 58 Follette Street, Grafton, MA

Via E-Mail

page 1 of 2

Per the Commission's request I have reviewed the Notice of Intent and associated documentation for this project and have evaluated the project site. In particular, I reviewed proposed wetland impacts and mitigation measures. A list of the documents reviewed, along with my comments and recommendations, is as follows.

Documents Reviewed:

- Notice of Intent (WPA Form 3), and associated documentation, under cover dated October 11, 2022;
- Wetland Summary Letter by Lucas Environmental, dated October 7, 2022;
- Plans entitled "Site Name: Grafton 5 MA", by ProTerra Design Group, LLC, revised through September 26, 2022.

Comments & Recommendations:

1. As of today's date, there does not appear to be a DEP file number available.
2. I am in general agreement with the proposed wetland replication construction and planting details. This being said, I have several specific concerns regarding the overall impacts and mitigation as noted below.
3. The project is proposing to replicate permanent wetland fill at a ration of 2.5:1 (replicated to filled). This is 1.5 times more replication than is required and will result in the destruction of a high quality, mature, overstory forest buffer zone located between Follette Street and the wetland. I strongly recommend against disturbing any more of the forested buffer in this area than is necessary. The proposed replication area on the opposite (northwest) side of the wetland is in a less mature, lightly wooded area that is more suitable for replication. With modifications to the stormwater basin and outlet, the replication area on the northwest side could be expanded somewhat. There is no particular reason to replicate to the extent currently proposed. In addition, the project proposes to remove an existing stone box culvert that is within the delineated wetland. The culvert is elevated above the wetland and removing and restoring its footprint would result in approximately 200-square feet of additional wetland that could be counted as part of project mitigation.

4. A stockpile area for wetland topsoil is located on the southeast side of the wetland, outside the proposed clearing limit. I recommend relocating this stockpile to the northwest side of the wetland or adjusting the clearing limit to include this area. In general, there is very little room for staging of equipment and materials between Follette Street and the wetland. Given that the wetland has to be crossed before accessing the larger project area, additional detail should be provided regarding access, staging and sequencing of construction related to site access and the wetland crossing while also minimizing impacts to the forested buffer.
5. The wetland drains via an existing, 12-inch corrugated plastic culvert located between wetland flags A-8 and A-9. This culvert appears to have been installed to facilitate the development of 56 Follette Street as it extends approximately 100-feet underground between Follette Street and house No. 56 before daylighting on the east side of No. 56. The culvert appears to turn with no visible manholes. The design and installation of this culvert is questionable and I recommend against permitting new development discharging to it without confirmation of its design, condition and functionality. Repair or replacement of the culvert should be made as necessary to ensure it's long-term functionality.

Please let me know if you have any questions or comments.