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MEMORANDUM

Date: February 8, 2023

To: Grafton Conservation Commission

From: Arthur Allen

Re: Supplemental Peer Review for 58 Follette Street, Grafton, MA (DEP File No. 164-1031)

Via E-Mail

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Per the Commission's request I received and have reviewed revised project documents associated with the Notice of Intent ("NOI") for this project. A list of the documents reviewed, along with my additional comments and recommendations (in **bold** font), is as follows.

Documents Reviewed:

- MA DEP File Number Comments;
- ProTerra Response to Peer Review, dated January 19, 2023;
- Revised Plans entitled "Site Name: Grafton 5 MA", by ProTerra Design Group, LLC, revised through January 17, 2023.

Comments & Recommendations:

1. The DEP file number comments pertained to investigating alternative site access that would avoid or minimize wetland impacts. **I am not aware of a full response to the DEP comments, from the applicant.**
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. **The plans have been revised to limit disturbance of**

high quality, upland forest buffers. I am in agreement with the revisions and with the detailed wetland mitigation/replication protocols.

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. **Revisions have been made to incorporate appropriate site access and staging/stockpile areas. No further comment.**

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. **The 12-inch culvert draining the wetland across the frontage of 56 Follette Street has been studied and it appears to be in good condition. This being said, based on the age estimate of 20-years, the culvert should have been permitted through the Conservation Commission. Assuming it was permitted, or it is grandfathered through other permits, the applicant should be allowed to tie into it. If it was not permitted, the Commission may want to pursue a potential violation at 56 Follette Street. Since the culvert extends onto 58 Follette Street, any potential violation associated with the culvert would also impact 58 Follette Street.**

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