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Walpole Conservation Commission
c/o Ms. Landis Hershey, Conservation Agent
135 School Street
Walpole, MA 02081

Via: Email to: lhershey@walpole-ma.gov and Federal Express

Reference: Review of Notice of Intent – Roscommon OSRD
North Street (Map 12, Parcels 42 and 42-7)
MassDEP File No. 315-1094
Walpole, Massachusetts
B+T Project No. 2580.01

Dear Commissioners:

As requested, Beals and Thomas, Inc. (B+T) has reviewed the Notice of Intent (NOI) to assist the Walpole Conservation Commission with the Roscommon Open Space Residential Development (OSRD) located on North Street in Walpole, Massachusetts.

We received the following documentation on October 13, 2015, which formed the basis of our review:

- *Notice of Intent – Roscommon OSRD in Walpole, Massachusetts*, prepared by Lucas Environmental, LLC, dated October 7, 2015

We received the following supplemental documentation on October 28, 2015:

- *Roscommon Open Space Residential Development, Walpole Massachusetts*, prepared by Glossa Engineering, Inc., dated August 10, 2015, revised October 21, 2015 (27 sheets)

We received the following supplemental documentation on November 4, 2015:

- *WPA Form 3 – Notice of Intent* (please note that B+T did not receive the entirety of the original NOI application and therefore cannot comment on certain logistic compliance (i.e. notification of abutters within 300-feet of the subject property, etc.))

In addition, we performed a field review on November 5, 2015, with Thomas Liddy, PWS, CWS, of Lucas Environmental, LLC, John Glossa, PE, of Glossa Engineering, Inc., as well as the Applicant, SRII Ventures, LLC. Since the wetland delineation has been approved through a valid Order of Resource Area Delineation (ORAD) (DEP File# SE315-1041), the flagged wetlands were not reviewed for accuracy. The purpose of the site visit was to familiarize B+T with the proposed work on the site, particularly with regard to wetland impacts and Limited Project status. The site visit began at the proposed Fisher Street access (site of Olmstead Estates, currently under construction) and progressed north and west across the site toward the North

Street access. Our review was undertaken in the context of the Massachusetts Wetlands Protection Act and Regulations (the Act), the Walpole Wetland Protection By-Law (the By-Law) and Walpole Wetlands Bylaw Regulations (the Regulations).

Overview

The applicant has prepared a comprehensive and well-articulated narrative in support of the proposed project. The proposed project consists of a 30-lot subdivision referred to as Roscommon Open Space Residential Development (Roscommon OSRD) located on approximately 76.76 acres between Fisher and North Streets in Walpole, Massachusetts. The site contains forested woodlands, open fields, trails and wetlands.

The onsite discussion with the applicant and representatives primarily focused on alternatives analyses and design work to date to avoid, minimize and mitigate wetland resource area impacts including other factors the representatives indicated were part of that analysis but that were not apparent in the NOI materials (i.e. design constraints, socioeconomic influences, discussions with other regulatory authorities, etc.). We recommend that the applicant provide a narrative documenting these factors for the administrative record.

As currently designed, the proposed project has maintained the local 25-foot No Alteration Area, with the exception of the proposed wetland impact and replication areas as noted in the NOI materials.

Vernal Pool

1. We commend the applicant for the efforts made to preserve the area surrounding the vernal pool by relocating the main access from the original location at the existing cart path to the southerly preferred alternative thereby reducing potential habitat fragmentation. Additionally, locating wetland replication area #1 in this vicinity and reducing the size of and depicting building envelopes on the adjacent house lots are also beneficial to the nearby resource areas. We recommend reduction or elimination, as feasible, of the proposed grading associated with walking path improvements in order to minimize work in this area, adding further protection to the vernal pool. As it is shown, grading appears to be proposed up to the edge of the 25-foot No Alteration Area. We recommend that the proposed work in this area (i.e. grading along edge of cart path as shown on Plan Sheet 12) be clarified for the Commission's review.

OSRD Access Roadway and North Street Driveway

2. The applicant is requesting that the project be reviewed under the Limited Project provisions of the Act (310 CMR 10.53(3)(e)) due to the necessity to cross wetland resource areas from either potentially feasible access point (North Street or Fisher Street). While B+T generally agrees that the project meets the criteria outlined in 310 CMR

10.53(3)(e) for the 10,645 sf of permanent resource area impacts associated with the construction of the main access road, we question the necessity of the proposed cul-de-sac shown as “Gigi’s Way” and the associated twelve-foot wide private driveway off of North Street. Though the proposed permanent wetland impact area is relatively small in this location (213 sf), these impacts may be avoided with a feasible alternative.

We understand that the North Street driveway access will be used to connect utilities across the site, but wetland resource areas impacts associated with utility installation typically results in less impact than a permanent crossing, both in terms of magnitude and because the impact is replicated in place with existing hydrology. It is unclear why this driveway location is being sought for access to Lot 30. We request further exploration of a potential alternative driveway route from the main access road in the vicinity of Lots 14-16 that would avoid wetland resource area impacts.

3. We acknowledge and agree that the applicant proposes resource area crossings in compliance with the Massachusetts Stream Crossing Standards as detailed in the narrative and summarized in Table 4-2. After onsite discussion with the Applicant’s representatives, this approach appears to address stream continuity. We request documentation of avoidance/minimization measures that were considered but eliminated and associated reasoning, including a potential span or partial span alternative that may decrease or avoid wetland fill.
4. As previously noted, we commend the applicant for locating the preferred Fisher Street roadway access south of the vernal pool to avoid impacts to the most sensitive areas of the associated wildlife corridor. We agree that this main access should be located to the south of this important resource area and surroundings; however, we note that the Bordering Vegetated Wetland (BVW) is narrower even further to the south of the preferred location. If the access road was relocated further south, this may further minimize wetland impacts associated with this crossing. As discussed with the Applicant, we request further exploration to evaluate wetland impacts associated with a crossing at the narrowest portion of the wetland south of the preferred alternative.
5. During the site visit, the Applicant’s representatives noted revised curbing proposed in areas where wildlife movement may be impacted by vertical curbing. We recommend that this feature be added to the plan.
6. After an onsite discussion and review of the North Street access road option, we agree with the Applicant’s analysis that if North Street were the preferred main access road location, the project would incur additional wetland resource area impacts as summarized in Table 6-1. It appears that the significant change in topography and the grading and infrastructure required to design and construct an access road in this area would increase overall wetland impact. However, we recommend that the applicant provide additional

information comparing the total project wetland impacts associated with the two main access locations.

Replication Area

7. We note that the proposed replication area #1, though not proximate to the proposed main access road wetland crossing and associated impact area, has been located appropriately and is contiguous with the impacted wetland. There are benefits to the use of this location including its general proximity to existing resource areas, no significant topographic constraints (which reduces the total disturbance area within the No Alteration Area and Buffer Zone), as well as the potential to maintain wildlife values. We noted a number of invasive or nuisance species currently located in the proposed replication area #1. We request that the applicant provide a removal and disposal plan as well as an invasive species monitoring and management plan to facilitate replication area success.
8. Though the replication area #2 appears to have been located and designed appropriately with regard to the proposed impact the crossing near North Street, as noted in Comment 1 above, we question the necessity of this driveway access. The construction of this driveway and the associated replication area will be disruptive and may cause additional damage to the resource area since the only other work proposed here is the utility line, which typically has less impact than a permanent crossing. We request, as noted above, that this alternative be reevaluated and that further exploration of a potential alternative driveway route from the main access road in the vicinity of Lots 14-16, which would avoid wetland resource area impacts, be explored.
9. We suggest that a monitoring program be formalized to ensure long term success of the replicated wetland resource area(s).

We appreciate the opportunity to assist the Walpole Conservation Commission with the review of this application. Should you have any questions, please do not hesitate to contact our office.

Very truly yours,

BEALS AND THOMAS, INC.



Sarah W. Stearns, PWS
Senior Environmental Specialist

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