

BEALS + THOMAS

BEALS AND THOMAS, INC.
Reservoir Corporate Center
144 Turnpike Road
Southborough, MA 01772-2104

T 508.366.0560
F 508.366.4391
mail@btiweb.com | www.btiweb.com
Regional Office: Plymouth, MA

December 17, 2010

Mr. Adam Bossi, Conservation Administrator
Town of Wellesley
Natural Resources Commission
Wetlands Protection Committee
525 Washington Street
Wellesley, MA 02482-5992

Via: Email: abossi@wellesleyma.gov
U.S. Mail

Reference: Notice of Intent Review
Wellesley Country Club
Wellesley, Massachusetts
Project No. 2254.00

Dear Mr. Bossi and Members of the Wetlands Protection Committee:

Beals and Thomas, Inc. (B+T) has conducted a review of the site plans and supporting documentation for the Wellesley Country Club (WCC) Notice of Intent submission, DEP File #324-647. Our review included site visits to observe the current conditions of the three proposed work areas on the WCC property as well as review of the following documentation:

- *Stormwater Management Report*, prepared by Andrews Survey & Engineering Inc., dated August 16, 2010.
- Wellesley Country Club Turf Care Maintenance Facility Plan Set, prepared by Andrews Survey & Engineering Inc., dated August 16, 2010.
- Wellesley Country Club Notice of Intent dated August 17, 2010.
- Power Point Presentation Wellesley Country Club dated September 2010.
- Letter to Wellesley Wetlands Protection Committee from Coneco Engineers Scientists and Surveyors (Coneco) dated September 16, 2010.
- Letter to Wellesley Wetlands Protection Committee from Coneco dated September 30, 2010.
- Planting Plan, Sheet 1 and 2 by Gardner and Gerrish dated September 20, 2010.
- Non-Limiting List of Items Peer Review by Dr. Carlos Gimeno dated October 10, 2010.
- Country Club Questions and Information Request from Adam Bossi dated September 20, 2010.
- Letter to Wetlands Protection Committee from Patrick C. Garner Company, Inc. dated October 28, 2010.
- Letter to Wellesley Wetlands Protection Committee from Coneco dated November 9, 2010.
- Various public comments and questions submitted to the Wetlands Protection Committee.

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This information was reviewed in the context of the Massachusetts Wetlands Protection Act (the Act) and the Town of Wellesley Wetlands Protection Bylaw (the Bylaw) and Wetlands Protection Regulations (the Regulations).

The work proposed in this Notice of Intent includes three areas referred to as:

- Site 1, Turf Care Maintenance Facility located on the western side of Brookside Road approximately halfway between Wellesley Avenue and Oakland Street;
- Site 2, Bulk Maintenance Storage and Comfort Station located on the western side of Brookside Road at the north end of the WCC property near Oakland Street; and
- Site 3, Environmental Management Facility located on the south side of Wellesley Avenue, north of Forest Street.

Construction for the Environmental Management Facility (Site 3) does not occur within jurisdictional areas subject to protection under the the Act or the Bylaw, though the Applicant has provided a summary of this facility in order to describe all the work being proposed.

As part of B+T's review and analysis of the Applicant's Notice of Intent, we have spoken with Steve Fader, PE, the Wellesley Town Engineer, and Joe Duggan, the Wellesley Water & Sewer Department Superintendent. Both Mr. Fader and Mr. Duggan informed us that they had reviewed the NOI and their focus is to protect the Town's public water supplies. The water supply aquifer has potential to be most impacted by the Environmental Management Facility due to storage and transport of hazardous wastes and materials. Both Mr. Duggan and Mr. Fader were satisfied with the Applicant's plans for this Site 3, and Mr. Duggan is of the opinion that the proposed location for the Environmental Management Facility on the WCC property is most appropriate for protecting the Town's aquifer due to the soil and aquifer depth in the region of Site 3.

This report summarizes our findings and professional opinions regarding the project's compliance with the Act, Bylaw and Regulations, delineation of wetland resource areas, and proposed stormwater management system relative to the MassDEP 2008 Stormwater Handbook (the DEP Handbook). A substantial number of written comments have been submitted to the Wetlands Protection Committee by concerned citizens and their representatives. Many of these comments fall within general broad categories relating to both issues of concern under the Act and the Bylaw, though other comments deal with matters beyond the jurisdiction of the Wetlands Protection Committee. Many of the comments and questions submitted had been addressed by subsequent correspondences provided by representatives of the Applicant and general responses to other comments are provided within our report.

Following are our findings:

General Stormwater Comments

1. The proposed project will disturb more than one acre of land; therefore a NPDES permit under the Construction General Permit (CGP) is required. B+T recommends that the Applicant provide a copy of the associated Stormwater Pollution Prevention Plan and certification of coverage under the CGP to the Wetland Protection Committee prior to commencement of construction.
2. The impacts from the proposed gravel parking areas for Sites 2 and 3 are not included in the hydrologic analysis. Changing vegetated surfaces to gravel will result in increased runoff. The Applicant must include this gravel area in the proposed conditions analysis and provide appropriate mitigation.
3. Water Quality Volume calculations compliant with Standard 4 of the DEP Handbook have not been provided. The proposed project is located within a Zone II (Critical Area); consequently calculations showing the first 1" of runoff of water quality volume must be provided.
4. The Operation and Maintenance requirements provided both within the Stormwater Management Report and on the plans do not include maintenance requirements for the proposed subsurface infiltration systems.
5. Section 8 of the Long Term Pollution Prevention Plan should be revised to state, "See Stormwater Operation and Maintenance Plan." The information contained in Section 8 is redundant, and does not include maintenance measures for all stormwater BMPs. Specifically; the section does not include requirements for the rain garden and subsurface infiltration structures.
6. The proposed design includes rain gardens and subsurface infiltration chambers. Soil testing data in compliance with the DEP Handbook with regard to recharge rates and groundwater depth have not been submitted. Without this information B+T cannot confirm the infiltrative Best Management Practices (BMPs) will function as intended.
7. Calculations demonstrating that the infiltrative BMPs will dewater within 72-hours as stipulated in the DEP Handbook have not been provided.
8. In accordance with the DEP Handbook and the requirements of the Construction General Permit, measures must be taken to protect all infiltrative BMPs from sediment laden water and compaction during construction. These measures must be described in the Stormwater Pollution Prevention Plan.

Riverfront Area Alternatives Analysis

The alternatives analysis provided in the August 17, 2010 Notice of Intent, September 2010 PowerPoint and additional description provided with Coneco letter of November 9, 2010 do not fully and adequately address potential alternatives to the proposed Site 1 and Site 2 as required by the Act. Much of the alternatives analysis is directed at the proposed Turf Care Maintenance Facility (Site 1) which the Applicant indicates requires a minimum 1.5 acres of land in order to

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achieve the project intent for storing, servicing, cleaning, etc. of maintenance equipment with the single facility. The Applicant has provided written description of various alternatives. However, only very limited overall plans of the WCC property were presented with the September 2010 PowerPoint and this does not provide the reviewer with an adequate overall assessment of the property. A plan should be provided which identifies the boundary of the golf course property along with clear delineation (even if approximate) of jurisdictional resource areas and buffer zones as well as availability of the utilities to allow for the assessment of all properties. The Applicant should provide an associated narrative assessment referencing such plan.

It appears that the Bulk Materials Storage Facility (Site 2) could practicably be relocated within upland areas in and around the Environmental Management Center (Site 3). The Comfort Station, which is located outside of resource area, could be maintained in its proposed location, separate from the bulk storage. The sewer force main utility from the Comfort Station is appropriate in Riverfront Area (RFA) as the alternative would be an on-site septic system.

The alternatives analysis states that there are no other practicable and substantially equivalent economic alternative for the proposed Turf Care Maintenance Facility. We do not necessarily agree with this conclusion, as there could be more appropriate siting of the building and parking within this same general region that would have less impact on the RFA. The proposed access drive off of Brookside Road is located at the closest point to the RFA and has been sited to provide optimum sight distance at this driveway intersection. However, it appears that this driveway could be located at a point southerly off of Brookside Road, entirely outside of the RFA. The Maintenance Facility building could correspondingly be shifted southerly, outside of the inner 100-foot RFA. Also, rather than the linear rectangular building proposed, an alternative building with an angle to better fit the constrained site between Brookside Road and the adjacent fairway would allow for this building and site improvements to better fit the shape of the land area. Other minor adjustments to minimize the work such as providing utility connections to Brookside Road outside of the RFA will limit the overall impact and therefore better protect the Interests of the Act and Bylaw. The Applicant may contend that the drivable location at the southerly point along Brookside Road could restrict sight distance, though based upon our review of the physical constraints, it appears that adequate sight distance could be accommodated. Although providing an angle within the proposed Maintenance Building could add some construction costs of this facility, it could be substantially equivalent and practicable.

The Coneco November 9, 2010 letter regarding RFA alternatives states that "*The purpose of this project is to replace aging and inadequate facilities with new facilities designed to properly maintain, store, and deploy the golf course maintenance equipment with the Wellesley Country Club already owns.*" The question as to whether this "purpose" is reasonable and appropriate considering constraints of the site and potential impacts to the Interests of the Act and Bylaw is a point that the Wetlands Protection Committee must determine. As the WCC is currently operating and has operated out of their existing facilities for decades, it may be reasonable to

conclude that this could continue, with a less desirable expansion that would maintain work outside of the RFA. Alternative 1 – the No Action Alternative in the Coneco November 9, 2010 letter identifies the WCC current constraints to running their golf course operations efficiently and their desires/needs to add new technology and improve operations. The determination that the Wetlands Protection Committee must make is whether or not a less desirable expansion for the WCC that maintains work outside of RFA would be adequate. For example, it may be practicable to construct the equipment service wash down facility and a somewhat smaller maintenance facility in the same general location off of Brookside Road, but shifting it southerly outside of the RFA.

The alternatives analysis should consider utilizing the space that is to be freed up by moving out or partially moving out of the existing maintenance facility to limit disturbing RFA. For example, it may be practicable and economically viable to utilize this space for wash down and bulk material storage to reduce impacts in the RFA at Site 1 and potentially eliminate all above ground improvements proposed within RFA at Site 2.

Turf Care Maintenance Facility (Site 1)

1. The access driveway off of Brookside Road is proposed with a crown along the center and only one catch basin is depicted on the western side of this driveway. A second catch basin should be provided on the east side of the driveway to intercept and treat runoff from this proposed pavement prior to flowing into Brookside Road and Rosemary Brook.
2. Roof drain runoff from the eastern side of the proposed maintenance facility and the entire roof drain from the proposed equipment service center will discharge into the closed drainage system that would be treated within a Hydroguard Stormwater Separator unit (HG). Roof drain runoff is not required to be treated and the HG structure will provide better water quality mitigation from parking surface runoff without the additional dilution of runoff water from the roof drains. The Applicant should consider directing the roof runoff to a connection downstream of the proposed HG unit.
3. According to the Applicant, runoff generated by the impervious surfaces of the proposed turf care maintenance facility and parking lot is proposed to meet the groundwater recharge requirements of the DEP Handbook by diverting the majority of the surface runoff to the on-site golf course pond, which is utilized for irrigation. The Applicant states that the water used for irrigation will recharge the groundwater table and meet the requirements of Standard 3 of the DEP Handbook. This assertion by the Applicant is incorrect. Currently rainfall landing on the project site recharges the groundwater table which likely flows easterly towards Rosemary Brook. This existing condition groundwater recharge maintains perennial flow in this river. The Applicant is proposing to intercept this recharge from the paved areas, and divert much of it to the golf course pond which is used for irrigation. The Applicant's representatives have informed us that this pond is located within till soil, which provides minimal recharge to the groundwater

table. When water is withdrawn from this pond and used for irrigation on-site, it will not recharge the groundwater table in a similar manner, as much of this water is consumed by evapo-transpiration. In order to adequately achieve groundwater recharge in accordance with Standard 3, recharge basins or infiltration structures must be installed to recharge runoff from the roof and impervious parking surfaces within the same general area of the aquifer. It may also be appropriate for the proposed roof drains at the western side of the Maintenance Facility to be eliminated and drip directly from the roof edge where sheet flow runoff over an extended flow path of the vegetated area and adjacent fairway can recharge groundwater via Low Impact Development (LID) standards. This will reduce the costs and impact from this project and provide for recharge of the groundwater table within the pervious "A" soils.

4. The stormwater design has a significant portion of the runoff from impervious surfaces associated with the roofs and parking areas at this site discharging westerly to the irrigation pond, which is a regulated resource area under the Act and Bylaw. Stormwater calculations are not provided to identify the increased flow rates and volumes tributary to this resource area. During larger storm events, we understand that this golf course pond in fact does discharge and as such there will be an increase in the rate and volume flowing from the property, which must be mitigated with appropriate stormwater management facilities to provide peak flow rate and volume attenuation as well as groundwater recharge as previously noted in our comments.
5. The existing catch basin within Brookside Road is proposed to be protected with a hay bale filter per Detail 4 on Sheet C5.1. This hay bale filter will interfere with vehicle traffic along Brookside Road. We suggest that the hay bale filter be replaced with a catch basin silt sack, which must be maintained frequently during the construction operations and included within the erosion and sedimentation plan. (Note: Section 5.8 of the Stormwater Management Report identifies that an Erosion and Sedimentation Control Plan is provided as part of the Site Plan Application to the Planning Board, though B+T has not received a copy of this plan). In addition to the existing catch basin within Brookside Road, the Applicant should include filters or silt sacks around all proposed catch basin structures within and adjacent to the work area during construction operations and until the site is completely stabilized.
6. In the August 16, 2010 Stormwater Management Report, Tables 5.2.2.1 and 5.2.2.2 listing pre- and post-developed peak runoff rates and volumes for this portion of the project do not agree with the calculations. For example, the 10-year post condition runoff to TCMF "A" for the 10-year storm is listed as 0.21 cfs, whereas the HydroCAD calculation identifies this flow as 0.19 cfs. There are numerous other examples of similar errors in these two tables, which must be corrected by the Applicant to accurately reflect the runoff rates and volumes.
7. The peak runoff rates and volumes discharging toward the two design points ("A" and "B") at Brookside Road and ultimately flowing to Rosemary Brook are increasing from existing to proposed conditions. This flow is not meeting Design Standard 2 of the DEP

Handbook. Adequate stormwater management facilities must be provided to mitigate runoff rates.

8. The HydroCAD analysis calculates that the time of concentration (Tc) increases from existing to proposed conditions for Watershed B. The Tc represents the flow path which takes the longest amount of time for a drop of water to reach a design point; it is not necessarily the longest physical path. The Applicant has utilized distorted logic to increase the Tc under proposed conditions from that of the existing conditions, though a significant portion of the Tc path travel length from the existing conditions has been eliminated. This will yield inaccurately low proposed conditions flow rates to design point B, and calculations for Tc should be revised to accurately reflect the time of concentration.
9. The Tc for CB1 is modeled as 24 minutes in the hydraulic calculations, though the Tc in the HydroCAD program to this similar design point is identified as 9.4 minutes. The Applicant should provide data demonstrating how the catch basin Tc was determined, and clarify why the Tc varies so much between the hydraulic and hydrology calculations.
10. A detail of the proposed drop-inlet structure has not been provided. The Applicant should clarify the construction of this structure as it appears there are less than 6-inches between the top of pipe and the top of the structure.

Bulk Material Storage and Comfort Station (Site 2)

1. Two of the five bulk storage bins on the concrete apron are proposed to be covered by a roof structure. This roof structure will prevent rainwater from washing sediments out of the storage materials, which would flow across the concrete apron and eventually enter the proposed bioretention area. The Applicant has indicated that the roof covering is provided to maintain dry materials necessary for the golf course use. However, the Applicant should consider covering other sand, mulch and loam stockpiles to prevent sedimentation wash-off and contamination of the adjacent bioretention facility.
2. The proposed grading for the gravel parking does not clearly identify that this surface runoff will flow to the proposed bioretention area. The site plan should clearly identify runoff patterns and dictate grading such that runoff from the gravel surfaces will discharge to the bioretention area.
3. The proposed sewer force main extension on the east side of Brookside Road will be installed along the edge of pavement, partially in the 25-foot No Disturbance Zone (Regulations). The Applicant should instead extend this force main within the pavement along Brookside Road to avoid unnecessary removal of vegetation within the No Disturbance Zone, or confirm that no vegetation removal will occur. If work is to be performed within the 25-foot No Disturbance Zone, a revised "*Town of Wellesley Wetland Protection Bylaw (Section 44) Notice of Intent*" form should be submitted reflecting that a waiver is required, and a "*Request for Wellesley Wetland Regulations Waiver Form*" should also be completed and the Applicant must address the requirements

for waivers pursuant to Section 3.D and to Section 3.B(3) of the Regulations, which requires that waiver requests be made in writing.

4. The water main extension to the shelter house is proposed from Brookside Road, through existing wooded areas within the resource area buffer zone and RFA. The Applicant should revise the water main extension to a location through the proposed gravel parking area to avoid the unnecessary removal of vegetation within otherwise undisturbed portions of RFA and buffer zone.
5. The stormwater management calculations for this area do not provide a comparison of existing versus proposed conditions flow rates to confirm compliance with the DEP Stormwater Standards. Recharge calculations are provided for runoff on the concrete apron and shelter house roof only. However, as noted previously, the compacted gravel parking will increase runoff rates as will the proposed impervious surfaces associated with the apron and shelter house. The stormwater calculations must include existing and proposed runoff conditions with stormwater mitigation to maintain the flow rates.
6. The DEP Handbook requires a minimum depth of 3.0-feet for the soil mix in a bioretention area with trees or shrubs, which overlays an 8-inch layer of gravel. Additionally, an overflow drain is recommended to direct excess runoff from the surface to a perforated pipe within the gravel base layer. The proposed design illustrates a soil depth of 9-inches and does not include a gravel base layer. The Applicant should revise this Bioretention area/Rain Garden design with the appropriate details and calculations.

Environmental Management Facility (Site 3)

1. Though the proposed work associated with this portion of the WCC improvements is not within wetland resource areas or buffer zones, the facility is subject to the Wellesley Stormwater Bylaws.
2. The infiltration system design of this portion of the development accommodates recharge for runoff from the impervious roof of the Environmental Management Center, though it does not include the proposed surface associated with the concrete apron. Also, as noted previously, the addition of substantial areas of gravel will modify runoff patterns and increase the runoff rates and volumes above the pre-development conditions. The stormwater calculations do not provide a comparison of existing versus proposed condition runoff rates and no mitigation is proposed to control these rates. Hydrology calculations must include an analysis of existing versus proposed conditions and appropriate mitigation.
3. The narrative addressing Standard 4 states that the design provides 743 cf of recharge volume. The hydrology calculations indicate that the chambers only provide 276 cf of storage. The Applicant should clarify how much storage is provided and confirm compliance with the recharge standards.

Wetland Resource Area Delineation

B+T reviewed the wetland resource area delineation with the Applicant and its representative on December 1, 2010, and offers the following comments:

1. Wetland flags WF-C1 through C-10 as depicted on the plans accurately delineate Bordering Vegetated Wetland (BVW) constraining the proposed Turf Care Maintenance Facility (Site 1). A measurement was also taken southeast of WF-C1 from the edge of BVW to the roadway to confirm that the associated 100 foot buffer zone does not extend into the southern portion of the Site 1 project area.
2. Bank flags BF-A1 through BF-A9 as depicted on the plans accurately delineate Bank and Mean Annual High Water associated with Rosemary Brook.
3. The Bank associated with the irrigation pond proximate to Site 1 appears accurately depicted. Flags were not placed to delineate this Bank. Based upon the field review, it was confirmed that the Bank is consistent with a clear break in slope that is obvious in the field, and we therefore concur that flagging is not necessary.
4. Additional flags are present in the field, but are not depicted on the plans as those portions of the resource areas do not constrain the project areas. Some of these flags were briefly reviewed in the field and appeared accurate; however we recommend that any Order of Conditions specify that only those flags and resource areas depicted on the plans are confirmed as accurate.
5. At Site 1, we recommend that the plans be revised such that the 200 foot RFA, 100 foot buffer zone, 25 foot No-Disturbance Zone, and Limited Disturbance Zone end at the project site limit. Portions of these areas that are depicted extending east of the roadway are inaccurate.
6. The depression located at the site of the proposed Turf Care Maintenance Facility (Site 1) was reviewed. Although not ponded during the site visit, it was agreed that the area holds standing water at points during the year, and that greater than 50% of the vegetation within the depression is hydrophytic, with sedges and rushes present. Additionally, soils within the depression were hydric within 12 inches of the surface. The maximum extent of hydrophytic vegetation and hydric soils was measured in the field and it was agreed that the area appeared to be roughly 3,000 sf, which exceeds the minimum Bylaw size threshold of 2,500 sf for Isolated Wetland. Therefore, the area constitutes locally jurisdictional Isolated Wetland, and we understand that the Applicant's representative will delineate the extent of wetland with wire flags. These flags must be field survey located.

Based upon the history of the depression provided by the Applicant and its representative, the Isolated Wetland may not be federally jurisdictional. Specifically, Coneco's September 30, 2010 letter indicates that the depression "...was created during a former project at the course...In 2005 the irrigation pond on the opposite (right) side of the 3rd

hole fairway was dredged and the dredged material was placed on the left side of the fairway to dewater before being beneficially reused on the golf course property. This area was classified as uplands during that permit process. An area adjacent to the dredge material piles was temporarily excavated for water and sedimentation control..." The "Corps of Engineers Wetland Delineation Manual" indicates that, for man-induced wetlands, "If the type of activity resulting in the area being a potential man-induced wetland is exempted by regulation or policy, no further action is needed." Since the Isolated Wetland resulted from excavation within previously upland areas, it would appear not to be federally jurisdictional.

It is not possible to determine if the Isolated Wetland provides vernal pool habitat due to the time of year. Coneco has provided information addressing the likelihood of the area providing vernal pool habitat in its September 30, 2010 letter; however, this information alone is insufficient to definitively determine if vernal pool species utilize the Isolated Wetland. (We note that although the letter references that Coneco biologists did not observe egg masses or vernal pool obligate or facultative species, Coneco confirmed during the December 1, 2010 site visit that formal vernal pool investigations sufficient to determine if vernal pool indicator species utilized the pool were not performed.)

Pursuant to the Bylaw, any depression that holds some water for a minimum of two continuous months during the spring or summer will be presumed to provide breeding habitat for vernal pool indicator species. Coneco has indicated that documentation of the depression's hydro period is not available. Based upon soils analysis it appears that the hydrology may be driven by both surface water runoff as well as groundwater influence.

The presumption may also be overcome by a clear showing that the vernal pool does not and cannot meet the 2000 Natural Heritage & Endangered Species Program (NHESP) vernal pool certification criteria. We note that NHESP has since updated its certification guidelines, but that the guidelines referenced in the Bylaw included a "dry-pool" analysis which has since been eliminated. However, this may be inconsequential, as it is difficult to prove that a depression does not and cannot provide vernal pool habitat utilizing the dry-pool method.

We acknowledge Coneco's reference to the Bylaw that "*Pools occurring in lawns, landscaped area, or driveways as of April 9, 2002...are presumed not significant as wildlife habitat*" as well as comments received from others that this exemption does not apply since the pool was created after 2002. Given this unique situation where a landscaped area may have existed as of 2002, but at a higher upland elevation, and the depression was created later, we respectfully defer to the Commission as to the interpretation and intent of this presumption. However, we would typically interpret the presumption to apply if the Applicant provides sufficient documentation that the area was

previously landscaped prior to excavation. Specifically, it would seem inconsistent if a pool in a landscaped area, both of which existed as of 2002, would be presumed non-significant while a pool created after 2002 in a landscaped area in existence as of 2002 would be presumed significant.

With regard to the protection of vernal pool habitat pursuant to the Act, vernal pools are a habitat feature that occur within other resource areas (in this case RFA). Pursuant to 310 CMR 10.58(1) *"In those portions so extensively altered by human activity that their important wildlife habitat functions have been effectively eliminated, riverfront areas are not significant to the protection of important wildlife habitat and vernal pool habitat."* Additionally, in RFA, pursuant to 310 CMR 10.58(4)(d)(1)(c), *"Work shall not result in an impairment of the capacity to provide vernal pool habitat identified by evidence from a competent source, but not yet certified."* In order to receive "automatic" protection under the Act, a vernal pool must be certified. If uncertified, the burden of proof to demonstrate that a depression is or is not a vernal pool is not the Applicant's. Credible evidence that the area functions as vernal pool habitat must be submitted by others in order for the area to be protected under the Act. As previously noted, it is not possible to determine if the area acts as a vernal pool due to the time of year. Therefore, pursuant to the Act, the presumption is that the depression is not a vernal pool.

7. The Applicant must provide a revised *"Town of Wellesley Wetland Protection Bylaw (Section 44) Notice of Intent"* form reflecting the alteration to Isolated Wetland and if determined so by the Commission, Vernal Pool Habitat.
8. Based upon DEP's *"Massachusetts Wildlife Habitat Protection Guidance for Inland Wetlands"* (March 2006) the Applicant should submit a wildlife habitat evaluation, as impacts to undeveloped RFA exceed 5,000 sf. Note that a detailed evaluation should be submitted if the project is located within Habitat of Potential Regional or Statewide Importance or if credible evidence documenting that the Isolated Wetland provides vernal pool habitat is submitted.
9. B+T conducted a calculation to determine if the low area within Site 2 would be classified as Isolated Land Subject to Flooding (ILSF) under the Act. The Determination for ILSF stipulates that the area at least once a year confines standing water to a volume of at least $\frac{1}{4}$ acre-feet and to an average depth of at least 6-inches. The water within the depression may be a result of either runoff or high groundwater where it may rise above the surface. The attached ILSF calculation identifies that the water storage volume available below the outlet culvert at Brookside Road provides for approximately 0.1-acre-feet of storage, which is substantially less than the 0.25-acre-feet stipulated in the Act. As such, this area does not qualify as ILSF.
10. The Notice of Intent identifies that the RFA on the site is approximately 757,000 sf and proposed alteration in the RFA is approximately 51,000 sf. The actual plans presented by the Applicant as part of this Notice of Intent along with supplemental submittal materials make it impossible for B+T to confirm these areas. The Applicant should provide an

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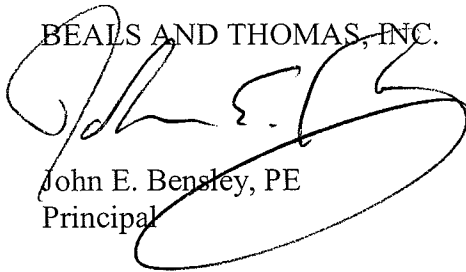
overall plan of the site property identifying the perennial streams and RFAs and provide area takeoff calculations that can be confirmed by B+T. Based upon our review and the plans for Sites 1 and 2, the total RFA disturbance area of approximately 51,000 sf appears to be approximately accurate with our ballpark measurements yielding approximately 50,000 sf of RFA Alteration.

We respectfully request that the Applicant provide a written response to the comments presented herein for the Administrative Record.

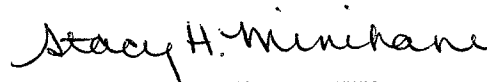
We thank you for the opportunity to provide review services to the Town of Wellesley Wetland Protection Committee. If you have any questions in regard to our review, please do not hesitate to contact us.

Very truly yours,

BEALS AND THOMAS, INC.



John E. Bensley, PE
Principal



Stacy H. Minihane, PWS
Associate

Attachment: ILSF Calculations

JEB/cp/SHM/225400LT001