



May 1, 2023

Town of Grafton Conservation Commission
c/o Leah Cameron, Conservation Agent
30 Providence Road
Grafton, MA 01519

Re: Notice of Intent / Grafton Wetland Bylaw Permit / Grafton Stormwater Bylaw Permit
95 North Street Site Improvements, 95 North Street, Grafton, Massachusetts
MassDEP File No. CE-164-1039

Dear Members of the Grafton Conservation Commission:

On behalf of the Applicant, the Town of Grafton Conservation Commission, c/o Leah Cameron, Conservation Agent, the Horsley Witten Group Inc. (HW), in conjunction with Ray Dunetz Landscape Architecture, Inc. (RDLA), is submitting this response to comments received by Commission staff (via email) on April 21, 2023, and comments from the Commission's peer review consultant, Graves Engineering, Inc. (GEI), on the stormwater design (dated May 1, 2023).

Please recall that the Town of Grafton submitted a Notice of Intent (NOI)/Grafton Wetland Bylaw Permit/Grafton Stormwater Bylaw Permit application and supporting materials for the creation of a passive recreation park within the recently acquired Town-owned parcel at 95 North Street. The proposed project includes construction of an entrance road, a small gravel parking area, a pavilion, nature play space, a trailhead, and an ADA accessible loop walkway. The design also includes two constructed wetlands (green stormwater infrastructure) that will be used to treat stormwater runoff and implementation of an erosion and sedimentation control program to further protect downgradient jurisdictional resource areas. Wetland mitigation is also proposed for unavoidable impacts to BVW associated with the access road crossing and the ADA loop trail. The project has been filed under two limited project provisions (310 CMR 10.53(3)e. and j.).

The comments received include the following:

Notice of Intent

1. Clarification on number of stream crossings. The project has one stream crossing associated with the access driveway, where a portion of wetland BA (flags BA-1 to BA-9) and Wetland BB (approximately flags BB-1 to BB-8) are associated with an unnamed intermittent stream that drains to an off-site drop inlet. Here, the project is designed to meet the intent of the Massachusetts Stream Crossing Standards where the Applicant proposes an open bottom (effective) culvert. The elevated boardwalk crossing of a second segment of the "BB" wetland flagging sequence in the central portion of the site traverses the southernmost historically excavated swale within the BVW as described in the Wetland Resource Evaluation report prepared by EcoTec, Inc., and the MA Stream Crossing Standards have not been applied, although the elevated boardwalk supported by helical piles would substantially meet the Stream Crossing Standards.

2. Proof of abutter notification. Attached to this letter is a scan of the stamped Certificate of Mailing receipts from the abutter notification (**Attachment 1**).

Plans

3. Include the 25' no disturb buffer line wherever the 100' wetland buffer line is shown. The attached updated plans show the local 25-foot no disturb buffer on all sheets where the 100-foot buffer to the wetland areas is shown (**Attachment 2**).
4. Include "limit of disturbance" in those words instead of limit of work. The limit of work has been relabeled to "Limit of Disturbance" or LOD on the updated planset. No additional substantive changes have been made to the project design (see **Attachment 2**).

Stormwater Peer Review

HW received the comment letter from GEI on May 1, 2023, and has the following responses.

5. Stormwater and Hydrology. GEI has expressed that there are no issues with the filing relative to the compliance with the MassDEP Stormwater Management Standards or the Grafton Stormwater Management Regulations.
6. General Engineering Comment. GEI expressed concern that the thickness of the bituminous concrete top course and recommended that the ½-inch thickness be increased to a minimum thickness of 1-inch up to 1½-inches. HW is open to having this be a condition of an Order of Conditions (OOC) issued by the Commission and we will make that adjustment on the construction plans.
7. O&M Plan. HW has corrected the typographical errors in the Constructed Wetland Operation & Maintenance plan and submits an updated version as an attachment to this letter (**Attachment 3**).

Thank you for your review of this project. We look forward to discussing the project with the Conservation Commission on May 2, 2023. Should you have any questions, please do not hesitate to contact me directly at (508) 833-6600 or aball@horsleywitten.com.

Sincerely,

Horsley Witten Group, Inc.



Amy M. Ball, PWS, CWS
Senior Associate



Ellen Biegert, RLA
Senior Landscape Architect

Enclosures

cc: MassDEP, Central Regional Office
Ray Dunetz, Ray Dunetz Landscape Architecture