



EcoTec, Inc.


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PEER REVIEW MEMO

Date: October 25, 2023

To: Sturbridge Conservation Commission

From:

	Arthur Allen, CPSS, CWS, CESSWI
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Re: National Grid Line 301, Sturbridge, MA (DEP File No. 300-1173)

Via E-Mail

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EcoTec, Inc. has reviewed the Notice of Intent (“NOI”) and field conditions associated with this project. Below you will find a list of documents reviewed along with our comments and recommendations in **bold** font.

Documents Reviewed:

- ✓ MA DEP File Number Comments;
- ✓ NHESP Response Letter dated September 15, 2023;
- ✓ Notice of Intent WPA Form 3, plus attachments, under cover revised through October 24, 2023;
- ✓ Geotechnical Map Book plans by Power Engineers revised through October 19, 2023.

EcoTec Comments & Recommendations:

The MA DEP File Number website lists the project with a file number and no comments.

The project is located largely within Estimated Habitat of Rare Wildlife PH 942. Box C.1.a was checked “yes” on WPA Form 3 relative to the project being located within Estimated Habitat. The subsequent sections of the Streamlined Review were not fully completed and it is not clear whether the Notice of Intent (“NOI”) was submitted to NHESP, as required. The project narrative states that the project is exempt from the MA Endangered Species Act but also states that NHESP requires “additional protections for rare species”. The Wetlands Protection Act Regulations require that the NOI (for work within rare species habitat) be submitted to NHESP and that an Order of Conditions cannot be issued until a response is received from NHESP (within the required timeframes). **NHESP comments were received and reviewed. The comments indicate that the project will have no adverse impact on wetland resource area habitat.**

All wetland resource areas present within the project areas have been documented in the application materials. These include Bordering Vegetated Wetlands (“BVW”), Bank, Riverfront Area, Bordering Land Subject to Flooding (“BLSF”) and associated State and Local Buffer Zones. As noted below, wetlands have encroached into the access roadway in several, new locations resulting in an increase in project impacts that should be accounted for both on the project plans and in the NOI form. In general, the project consists of heavy equipment access to geotechnical boring locations, and the borings themselves. The access will be over existing roadways and cartpaths (some of which are within Buffer Zone and some of which are within BVW, BLSF and Riverfront

Area). Some of the boring locations are within uplands outside of any Buffer Zones, some are within State and Local Buffer Zones, some are within Riverfront Areas and some are within BVW.

After performing a desktop review of the project, I evaluated all of the project accessways and boring locations in the field on October 18, 2023. **Modifications to the wetland delineations were made in several locations as noted below (listed by Wetland and Boring Location). These locations have been updated on the project plans and mitigation measures have been added/adjusted, as necessary, to protect the additional resource areas. The increased, temporary wetland impact area has been properly revised on the NOI WPA Form 3.**

The project is located within beaver-impacted wetlands in four (4) locations. Only one of these locations (i.e., McKinstry Brook crossing) requires removal and relocation of an existing beaver dam. The other locations may require temporary modifications to the dams, depending on water levels and weather conditions at the time of work. All beaver dam modifications will be overseen by Beaver Solutions, a qualified, local beaver control contractor. It is my understanding that emergency permits will be sought, as necessary, from the Board of Health and the Conservation Commission to facilitate the beaver control work. It is also my understanding that there will be no harm to beavers as a result of this project. **I am in agreement with the plans for temporary beaver controls.**

B.214/STUW09 – Additional portions of the access road to this boring location have been flooded by beavers and additional wetland vegetation has developed resulting in the wetlands encroaching across the access road. Existing wetland flag 139 was connected to 312 and 132 was connected to 306 to capture the additional wetland within the roadway. A second section of flooded/wetland roadway was noted resulting in wetland flag 219 being connected to 120 and 208 was connected to 112. **The applicant's revised cover letter indicates that flag 134 was connected to 308. This appears to be a typo as my notes indicate otherwise and the revised plan appears to reflect my notes correctly.** Additional, temporary swamp mat protection is provided, in these locations, to facilitate equipment access.

B.230/STUW14 & STUW15 – The access road to this boring location has been flooded, in two locations, apparently due to seasonal high water tables and additional wetland vegetation has developed resulting in wetlands encroaching across the access road. At STUW14, existing flag 214 was connected to a new flag labeled 102B and existing flag 212 was connected to a new flag labeled 103A. At STUW15, existing flag 214 was connected to a new flag labeled 103A and existing flag 102 was connected to 210. Additional, temporary swamp mat protection is provided, in these locations, to facilitate equipment access.

Thank you for the opportunity to provide these comments. Please let me know if you have any questions.