



Performance Standards Analysis

for

Blackstone Street Improvements
(Map 62, Parcels 1 & 5; Map 66, Parcel 1)
Bellingham, MA 02019

DATE:
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ADDRESSED TO:

Bellingham Conservation Commission
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Bellingham, MA 02019

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1.0 EXISTING CONDITIONS

The Project Site is known as Blackstone Street in Bellingham, MA (Map 62, Parcels 1 & 5; Map 66, Parcel 11). The Project Site consists of approximately 214-acres of mixed forested wetlands and uplands (Reference Figure 1). The site is bisected by two gas easements and an existing gravel road connecting Blackstone Street to Bellingham Road. The existing gravel road crosses a large Bordering Vegetated Wetland (BVW) system with an internal stream channel south of the existing roadway.

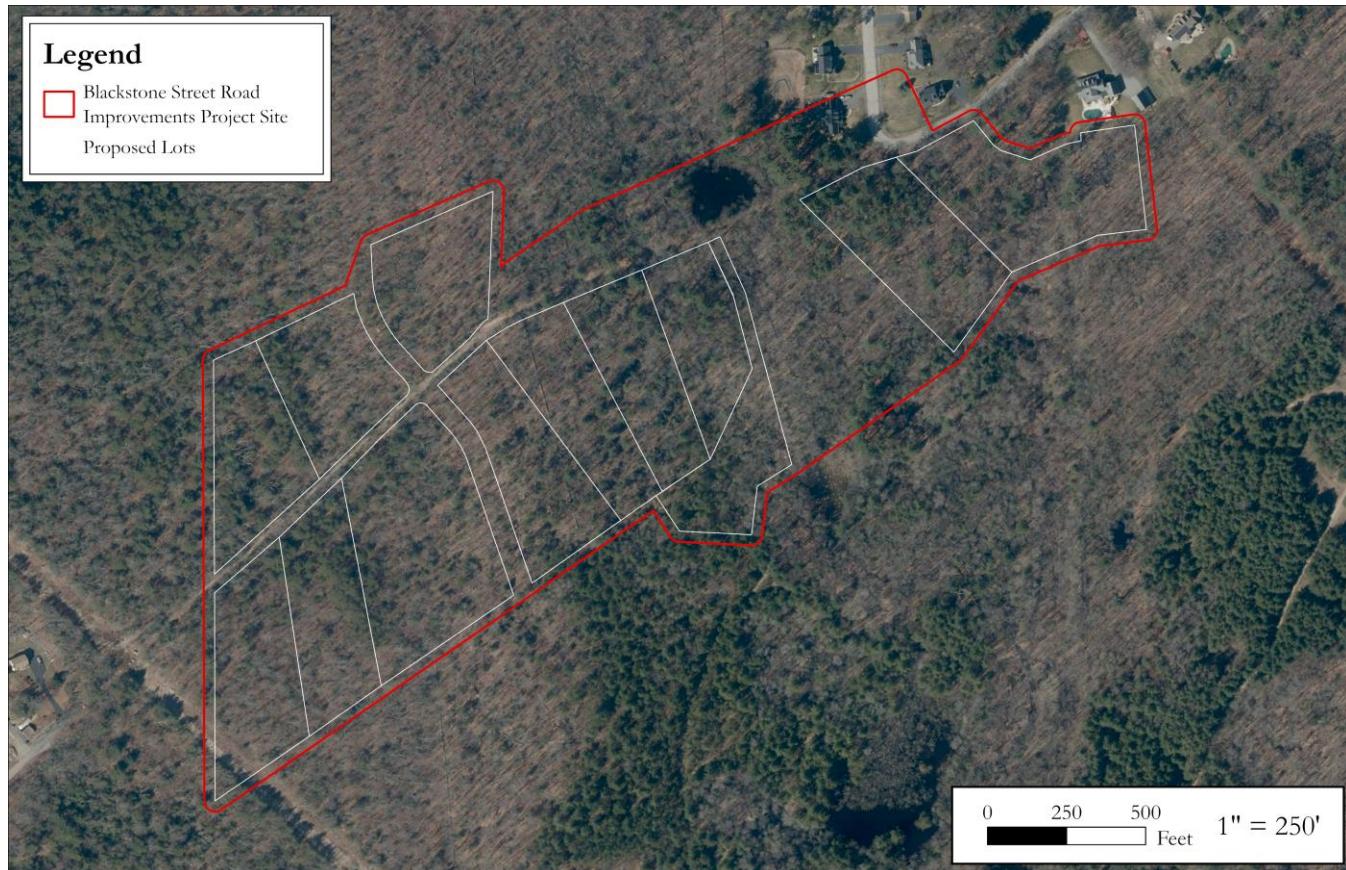


Figure 1. Existing conditions of the Project Site, including the proposed lots adjacent to the gravel roadway.

Multiple wetland resource areas are located with the Project Site. Bordering Vegetated Wetland (BVW) totaling approximately 3.7-acres ($\pm 159,688$ sf) was flagged with two wetland flag series consisting of series GCA, GCB and GCC (Reference Figure 2). The BVW exists mainly in the eastern portions of the site. A mapped perennial stream, known as Quick Stream, flows south of the existing gravel roadway and discharges into Lake Hiawatha south of the locus site. In January 2025, the Bellingham Conservation Commission issued a negative determination stating the stream does not meet the criteria for perennial status. Therefore, Quick Stream does not have a 200-foot Riverfront Area and only has a jurisdictional bank with an associated 100-foot Buffer Zone. The bank of the intermittent stream was not flagged due to the channel's presence within the flagged BVW. Three town-jurisdictional Isolated Vegetated Wetlands (IVWs) were flagged along the southeastern boundary of the Project Site. The IVWs were flagged with wetland flag series GCF, GCG, and GCI. One potential vernal pool was identified and flagged within the BVW of the easternmost proposed lot (Lot 1). The northern boundary of the potential vernal pool was flagged with flag series GCVP1 – GCVP10. According to the Bellingham Wetlands Bylaw, this potential vernal pool has a town-jurisdictional 50-foot No Disturb Zone.

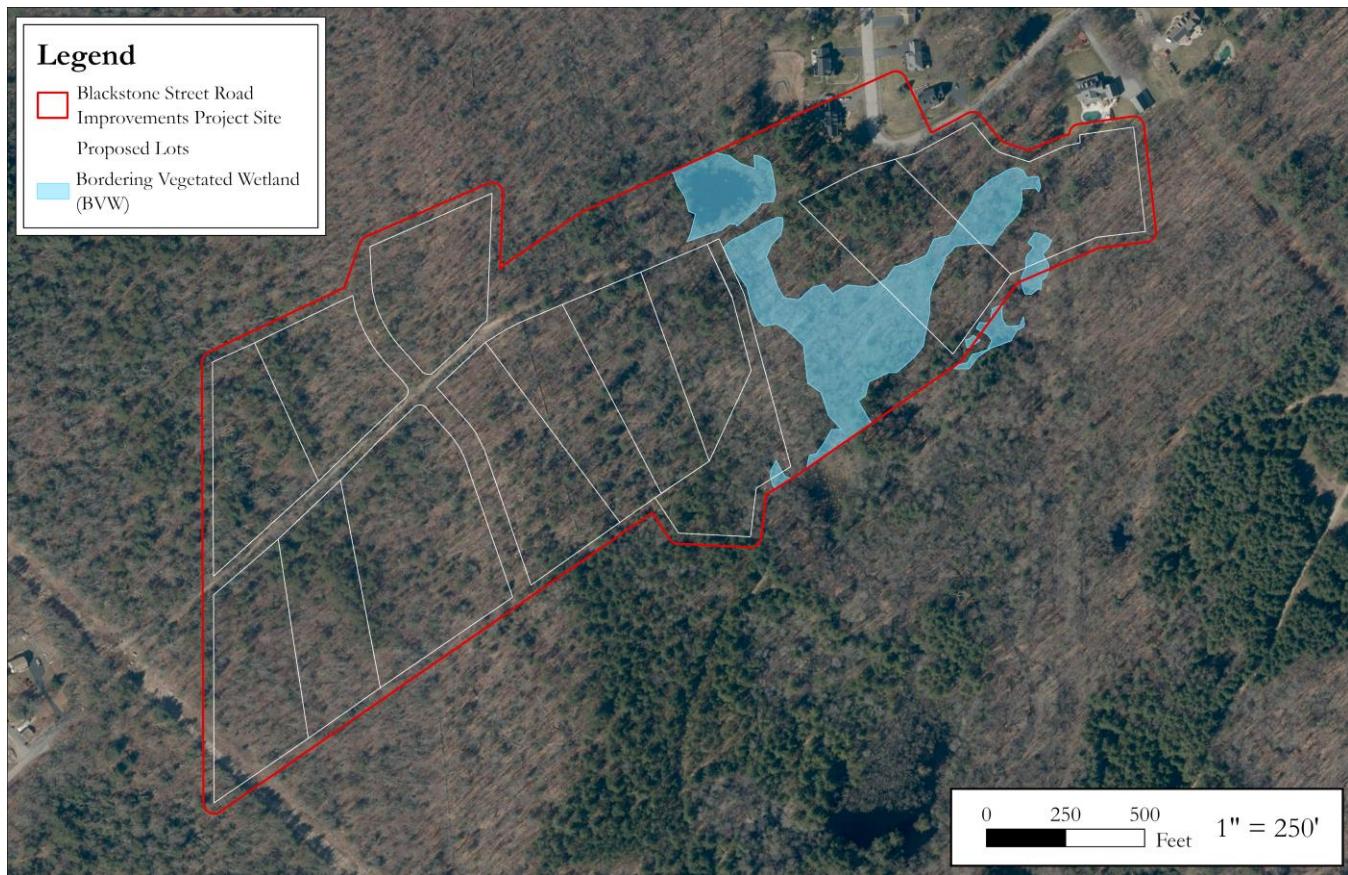


Figure 2. Existing conditions of the Project Site, including the proposed lots adjacent to the gravel roadway and the flagged Bordering Vegetated Wetlands and Isolated Wetlands.

The existing gravel road is proposed to be improved for future development. These improvements will result in a small amount of wetland impacts adjacent to the existing gravel roadway. The proposed wetland impact area is dominated by wetland vegetation consisting of Red Maple, Eastern White Pine, Common Winterberry, Sweet Pepperbush, Fox Grape, and Skunk Cabbage (Reference Photos 1 – 4).



Photo 1. A photo (facing south) of the proposed location of the improved wetland crossing (north of existing gravel road).



Photo 2. A photo (facing south) of the proposed location of the improved wetland crossing (south of existing gravel road).



Photo 3. A photo (facing north) of the proposed location of the improved wetland crossing (south of existing gravel road).



Photo 4. A photo (facing west) of the existing location of the gravel roadway & the adjacent wetland within the area of the proposed improvements.

According to the MassGIS data layers for NHESP, the Project Site is located within both Estimated Habitat of Rare Wildlife / Priority Habitat of Rare Species. No potential or certified vernal pools are mapped within the Project Site. No Outstanding Resource Waters (ORW) are mapped within the site. The property does not fall within a jurisdictional FEMA floodplain and the site is not located in an Area of Critical Environmental Concern (ACEC).

2.0 REGULATORY COMPLIANCE WITH WETLANDS PROTECTION ACT

Work within resource areas protected by the Wetlands Protection Act is being proposed. The project has been designed to minimize Buffer Zone & BVW impacts to the extent practicable. Table 1 below outlines impacts to the various resource areas and buffer zones on site. Explanation on how the project meets the performance standards of each resource follows.

2.1 BUFFER ZONE (100-FOOT)

The WPA Regulations do not contain performance standards for Buffer Zone Alteration (310 CMR 10.02(2)(b)). All reasonable efforts to avoid, minimize and mitigate adverse impacts on the Buffer Zone have been considered. Reference Table 1 and Figures 3, 4, and 5 for impacts to jurisdictional buffer zones.

Table 1. Wetlands Protection Act Impact Area Calculations Table (in Square Feet) - This table summarizes the total proposed impacts to the 25-foot No Disturb Zone, 50-foot No Build Zone, 100-foot Buffer Zone, and BVW on the Project Site.

Permanent Bordering Vegetated Wetland Impacts	Proposed Square Footage
SF of Total Impacts to Bordering Vegetated Wetlands On Site	±2,302
25-foot No Disturb Zone Impacts on Project Site	Proposed Square Footage
SF of Total Impacts to 25-foot No Disturb Zone On Site	±10,900
50-foot No Build Zone Impacts on Project Site	Proposed Square Footage
SF of Total Impacts to 50-foot No Build Zone On Site	±8,620
100-foot BVW Buffer Zone Impacts on Project Site	Proposed Square Footage
SF of Total Impacts to 100-foot Buffer Zone On Site	±14,120

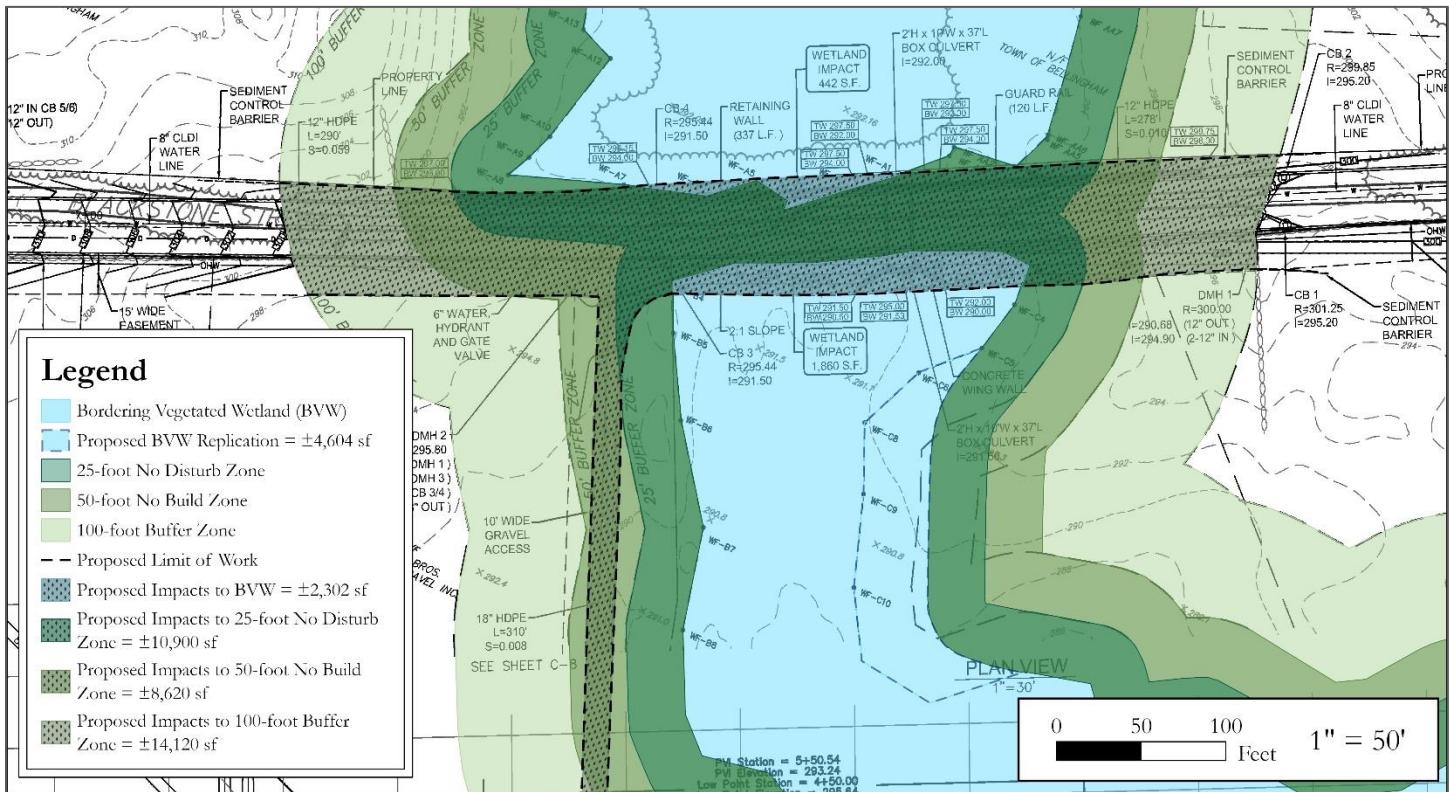


Figure 3. Proposed impacts to Bordering Vegetated Wetland and the associated buffer zones.

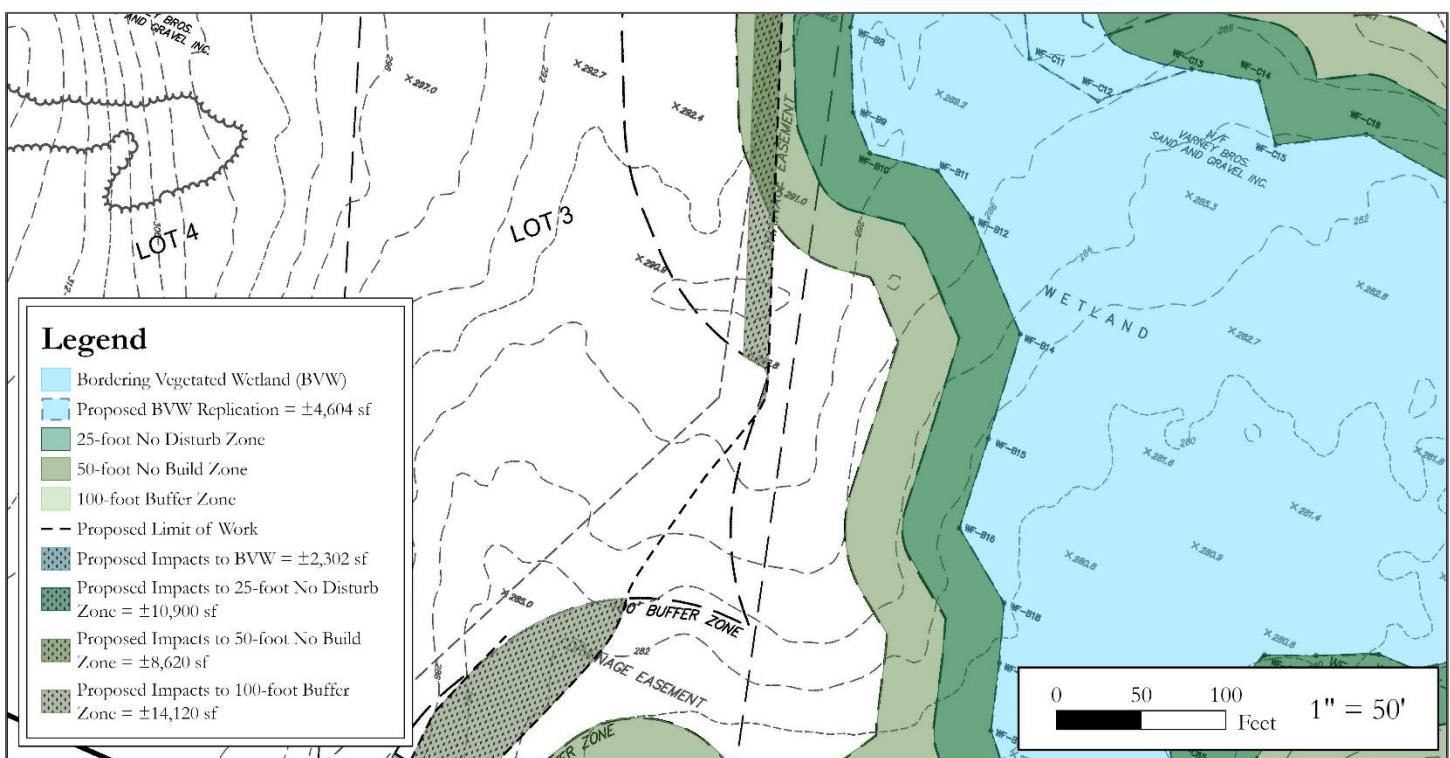


Figure 4. Proposed impacts to Bordering Vegetated Wetland and the associated buffer zones south of the proposed improved roadway.

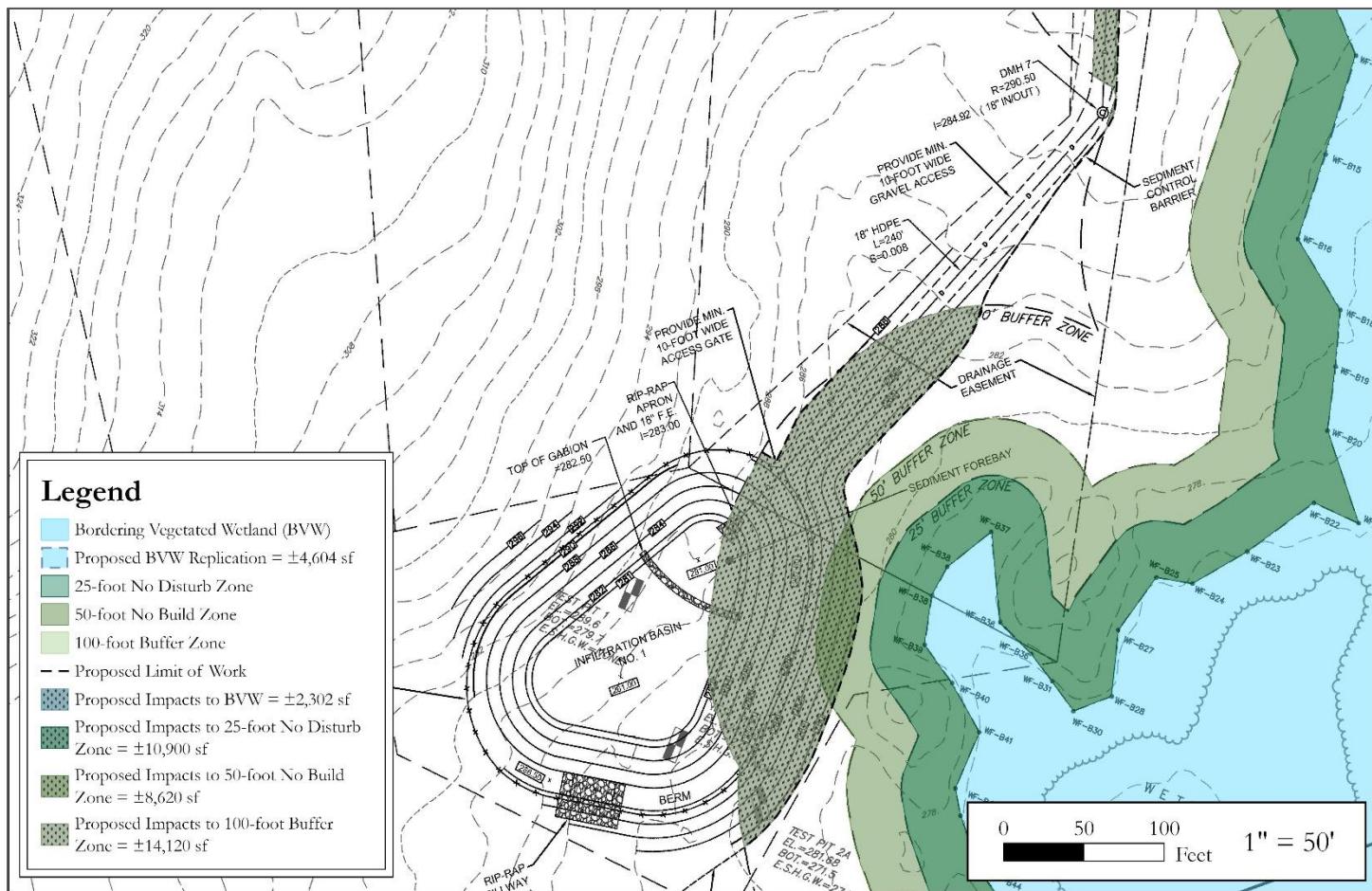


Figure 5. The proposed impacts to Bordering Vegetated Wetland and the associated buffer zones adjacent to Infiltration Basin #1, south of the proposed improved roadway.

2.2 BORDERING VEGETATED WETLANDS

§10.55	Bordering Vegetated Wetlands (BVW)	
	Performance Standard	Compliance
	<p><i>(a) Where the presumption set forth in 310 CMR 10.55(3) is not overcome, any proposed work in a Bordering Vegetated Wetland shall not destroy or otherwise impair any portion of said area.</i></p>	<p>A wetland crossing is required to reach the usable upland on the western portion of the Project Site. Currently, there is an existing gravel road extending west from the corner of Blackstone Street and Maddie Way. The existing road connects to the existing gas transmission right of way perpendicular to Bellingham Road. The gravel roadway is proposed to be improved with pavement and widening to accommodate two-way traffic. The widening of the existing roadway will result in a total of 2,302 sf of impacts to Bordering Vegetated Wetland. The proposed project is in accordance with 310 CMR 10.55(4)(b) to mitigate for the unavoidable alterations.</p>
10.55 (4)	<p><i>(b) Notwithstanding the provisions of 310 CMR 10.55(4)(a), the issuing authority may issue an Order of Conditions permitting work which results in the loss of up to 5000 square feet of Bordering Vegetated Wetland when said area is replaced in accordance with the following general conditions and any additional, specific conditions the issuing authority deems necessary to ensure that the replacement area will function in a manner similar to the area that will be lost:</i></p> <ol style="list-style-type: none"> <li data-bbox="246 1347 866 1453"><i>1. the surface of the replacement area to be created ("the replacement area") shall be equal to that of the area that will be lost ("the lost area");</i> <li data-bbox="246 1453 866 1558"><i>2. the ground water and surface elevation of the replacement area shall be approximately equal to that of the lost area;</i> <li data-bbox="246 1558 866 1664"><i>3. The overall horizontal configuration and location of the replacement area with respect to the bank shall be similar to that of the lost area;</i> <li data-bbox="246 1664 866 1769"><i>4. the replacement area shall have an unrestricted hydraulic connection to the same water body or waterway associated with the lost area;</i> <li data-bbox="246 1769 866 1911"><i>5. the replacement area shall be located within the same general area of the water body or reach of the waterway as the lost area;</i> 	<p>A wetland crossing is required to reach the usable upland on the western portion of the Project Site.</p> <ol style="list-style-type: none"> <li data-bbox="926 1094 1535 1347">1. The widening of the existing roadway will result in a total of 2,302 sf of Bordering Vegetated Wetland. A 4,604 sf wetland replication area is proposed south of the roadway (adjacent to flags GCC5 and GCC13). This will result in the net gain of 2,302 sf of BVW on the Project Site. <li data-bbox="926 1347 1535 1558">2. The groundwater and surface elevation of the replication area will match the grade of the existing adjacent BVW. Please reference the Wetland Replication Planting Plan prepared by Goddard Consulting for details. <li data-bbox="926 1558 1535 1812">3. The location of the proposed wetland replication area is located approximately 50 feet south of the proposed area of bank alteration. The replication area will be within the same wetland system and will be executed prior to alteration of the impact area. <li data-bbox="926 1812 1535 1911">4. The replication area is within the same Bordering Vegetated Wetland system as the proposed area of alteration.

<p>6. <i>at least 75% of the surface of the replacement area shall be reestablished with indigenous wetland plant species within two growing seasons, and prior to said vegetative reestablishment any exposed soil in the replacement area shall be temporarily stabilized to prevent erosion in accordance with standard U.S. Soil Conservation Service methods; and</i></p> <p>7. <i>the replacement area shall be provided in a manner which is consistent with all other General Performance Standards for each resource area in Part III of 310 CMR 10.00. In the exercise of this discretion, the issuing authority shall consider the magnitude of the alteration and the significance of the project site to the interests identified in M.G.L. c. 131, § 40, the extent to which adverse impacts can be avoided, the extent to which adverse impacts are minimized, and the extent to which mitigation measures, including replication or restoration, are provided to contribute to the protection of the interests identified in M.G.L. c. 131, § 40.</i></p>	<p>5. The location of the proposed wetland replication area is located approximately 50 feet south of the proposed area of alteration. The replication area will be within the same wetland system and will be executed prior to alteration of the impact area.</p> <p>6. The wetland replication area will be monitored by a qualified wetland scientist for three years following construction. Monitoring reports will be submitted to the Bellingham Conservation Commission to ensure 75% of the surface area is reestablished with native wetland vegetation.</p> <p>7. Please reference the Wetland Replication Planting Plan prepared by Goddard Consulting for additional details regarding compliance with 310 CMR 10.55(4)(b).</p>
<p>(c) <i>Notwithstanding the provisions of 310 CMR 10.55(4)(a), the issuing authority may issue an Order of Conditions permitting work which results in the loss of a portion of Bordering Vegetated Wetland when;</i></p> <p>1. <i>said portion has a surface area less than 500 square feet;</i></p> <p>2. <i>said portion extends in a distinct linear configuration ("finger-like") into adjacent uplands; and</i></p> <p>3. <i>in the judgment of the issuing authority it is not reasonable to scale down, redesign or otherwise change the proposed work so that it could be completed without loss of said wetland.</i></p>	<p>Based on the configuration of the existing wetlands on the site, the current location of the proposed roadway is the best option to minimize wetland impacts. A gravel roadway currently divides the two impacted wetlands. The proposed improved roadway will widen this existing roadway and add additional improvements such as stormwater features and a box culvert to restore hydrologic connection. Alternative designs or locations would significantly increase the amount of BVW alterations.</p>
<p>(d) <i>Notwithstanding the provisions of 310 CMR 10.55(4)(a),(b) and (c), no project may be permitted which will have any adverse effect on specified habitat sites of rare vertebrate or invertebrate species, as identified by procedures established under 310 CMR 10.59.</i></p>	<p>A portion of the proposed wetland alterations is located within Estimated and Priority Habitat of Rare Species. The Notice of Intent for the proposed improvements has been submitted to the Natural Heritage & Endangered Species Program (NHESP) for review. The NHESP will determine if these wetland alterations will have an adverse effect on the rare species of interest.</p>
<p>(e) <i>Any proposed work shall not destroy or otherwise impair any portion of a Bordering Vegetated Wetland that is within an Area of Critical Environmental Concern [...]</i></p>	<p>There are no mapped Areas of Critical Environmental Concern (ACECs) within the Project Site according to MassGIS data layers.</p>

3.0 CONCLUSION

In summary, Goddard Consulting believes that the proposed Bordering Vegetated Wetland alterations adjacent to the existing gravel roadway will not have any adverse impacts on corresponding wetland resource areas. The proposed project meets all regulatory compliance standards under the Massachusetts Wetlands Protection Act.

Please feel free to contact us if you have any questions.

Sincerely,

Goddard Consulting, LLC



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