

JULY 18, 2025

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Ms. Hannah Crawford, Administrator/Agent  
Bellingham Conservation Commission  
10 Mechanic Street  
Bellingham, MA 02019

RE: Prospect Hill NOI Peer Review (DEP File No. 105-0968)  
Off Lake Street/Prospect Street  
Assessors Map 69, Lot 87/Map 65, Lots 20, 22, 22-01 & 22-02  
Bellingham, MA

Dear Ms. Crawford and members of the Conservation Commission,

BSC Group, Inc. (BSC) is pleased to submit this final, supplemental review to the Bellingham Conservation Commission relative to the proposed construction of 156-unit townhouse residential development including the construction of roadways and associated infrastructure, utilities, stormwater management basins, and site grading off of Lake Street/ Prospect Street.

A Notice of Intent (NOI) was filed for this proposed project (the Project) under the Massachusetts Wetlands Protection Act (M.G.L. c.131 §40, the WPA) and its implementing regulations (310 CMR 10.00 et seq., the WPA Regulations) and the Town of Bellingham Wetlands Protection Bylaws (Chapter 235, the Bylaw) and implementing Regulations (Chapter 247) by Louis Petrozzi of Wall Street Development Corp. (the Applicant), represented by Paul McManus of Eco Tec Inc. (the Representative). Activities are proposed within the 100-foot Buffer Zone protected under the WPA and Bylaw and the project proposes alteration within Inland Bank, Bordering Vegetated Wetland (BVW), Land Under Waterbodies and Waterways (LUW), the 200-foot Riverfront Area, Bordering Land Subject to Flooding (BLSF), and the 100-foot Buffer Zone to Bordering Vegetated Wetland.

BSC provided peer review comments and recommendations of this application to the Bellingham Conservation Commission identified in peer review letters dated February 21, 2025 and April 7, 2025 respectively. Our comments were presented to the Commission at public hearings and discussed with the applicant and applicant's representative to address any outstanding concerns or comments. The remaining outstanding comments and responses to our comments are outlined in the staff memo dated 5/13/2025 and titled Outstanding Comments from BSC Peer Review. BSC has provided this final supplemental review of the application to address the issues related to the sewer main stream crossings and the wetland mitigation area.

**Original peer review letter dated 2/25/25 - outstanding comments:**

**Comment 17:** The applicant proposes installing an 8-inch sewer line from Cross Street near the intersection of Dupree Road and down Blackmar Street to the proposed development and 4-inch Force Main Sewer generally within the limits of the abandoned railroad grade. Plan Sheet S1 of 4 shows the sewer line crossing beneath an existing box culvert conveying Peters River at approximate Station 2+30 and Plan Sheet 9 of 43 shows the alignment of the sewer line within the parcel and location where it crosses Hoag Brook at a stone box culvert abutment of the railroad (approximate Station 21+10) and where the centerline is in close proximity to wetland (approximate Station 21+60 to Station 22+60)

The applicant should provide more detail on how the sewer line will be installed beneath the Peters River and Hoag Brook box culverts to avoid impacts to those resource areas. Additionally, the applicant should describe how and where trench dewatering will occur within town streets and proximity to wetland resource areas on the subject parcel. There is limited workspace within the limits of the abandoned railroad grade to excavate, stockpile material, install the sewer, dewater, where necessary, and backfill without resulting in direct impacts to wetland resource areas. It appears there are proposed impacts to wetlands from sewer line installation between wetland flags KRA1 and KRA5 that need to be accounted for on the NOI form.

**Applicant Response** - The suggested information and details will be provided.

#### **Staff Comments**

The sheets outlined in the Applicant's response S1-S4 last revised 1/30/2025, have not been included in the amended plan submission, submitted 5/1/25 (Plans included Sheets 1-43 and Supplemental Sheets A-D)

The Peters River sewer crossing construction detail on Supplemental Sheet C is new and has not been reviewed or commented on by BSC. The crossing itself, shown on supplemental sheets S1-S4 on plans dated 1/30/2025, does not show a cross-section detail or describe how the proposed crossing shall be achieved. The Prospect Hill - EcoTec – Construction Sequence letter dated 2/3/2025 also does not address this crossing.

#### **Final BSC Comment**

BSC has reviewed the Peters River sewer crossing detail shown on Supplemental Sheet C and has the following comments:

- The Applicant is proposing to install two (2) 12-inch bypass pipes to divert flows during sewer pipe installation under low flow conditions. The Applicant shows the culvert conveying the Peters River beneath the roadway as an open bottom box culvert but provides no dimensions of the box culvert. The Applicant should revise the plan to show the dimensions of the culvert.
- BSC is also skeptical that two, 12-inch pipes are sufficient to convey flows even under low flow conditions. The Applicant should provide their calculations in determining the chosen pipe size and address how to respond to an extreme rainfall event during sewer pipe installation.
- The Applicant should identify the location of the proposed frac tank dewatering area on the Project site referenced in note 5. d. of Supplemental Sheet C.
- The Applicant should update the proposed resource area impacts, specifically to Land Under Water, based on the proposed work at the Peters River crossing.

**Commit 18** – The affected bank and channel bottom should be restored to their natural state not armored with riprap. The applicant should provide a restoration plan for the temporary impacts associated with the Hoag Brook sewer line installation and should include using natural riverbed rock for restoration, work in low flow/no flow conditions and any time of year restrictions noted by DMF for fish passage

**Applicant response** - A restoration plan will be provided, along with a revised construction sequencing.

#### **Staff Comment:**

The stream channel within the work area will be restored with hand tools, to reestablish the channel topography and surface substrate to pre-work conditions. Flow will then be reestablished by slowly removing the temporary dam and gradually restoring flow to the channel. A detail is provided on Supplemental Sheet B. Does the applicant's response address BSC's concerns regarding best practices for restoration here?

**Final BSC Comment:**

BSC has reviewed the Hoag Brook sewer crossing detail shown on Supplemental Sheet B and has the following comments:

- The Applicant proposed “limited tree and brush removal” to perform the crossing. Is any of this within a wetland resource area? If so, those impacts should be identified and the proposed wetland impacts on the NOI form should be updated accordingly.
- The applicant should provide a detail of the temporary flow reducer at the downstream end of the discharge pipe for review.
- The Applicant should update the proposed resource area impacts, specifically to Bank and Land Under Water, based on the proposed work at the Hoag Brook crossing with respect to installing sand bags and poly sheet to dam the upstream end of the crossing and the crossing itself.
- BSC recommends that the Banks of the crossing should be restored to match upstream and downstream vegetated Bank conditions after the stone abutments are removed and the Banks are restored. BSC recommends that the Banks be restored vegetatively rather than riprap or stone. However, there should be consideration given to potential scouring flow velocities.

**Comment 36:** The wetland replication plan is incomplete and should be revised to ensure compliance with section 247-20(l) “The proposal for a replication area (submitted with the Notice of Intent) shall include a detailed plan of the wetland replication showing: [1] Cross-section with indication of groundwater level, soil profile and thickness of organic soil in the existing and proposed wetlands; [2] Plant species detail, including number, type and location of species found in the replication area to be altered, and number, types and locations of species to be introduced into the replacement area; [3] Detail of stabilization plans for replication area of banks; [4] Wildlife habitat diversity plan; [5] Any trees over two inches dbh shall be replaced in accordance with § 247-23 of these regulations, Vegetation removal and replacement.

**Applicant Response** - Additional replication area details shall be provided. We note however that the proposed IVW fill is within areas that developed in the former gravel mine and the proposed mitigation area is intentionally different.

**Staff Comment**

The applicant has addressed some of these requirements. The applicant has provided some of the requested information in narrative form and placed the narrative onto the planset.

- No cross section is shown
- The plan does not determine what vegetation currently within the replication area will be altered
- The plan narratively addresses the number type and location of proposed plantings in a generalized format in Section 9 that has been amended to address BSC’s concerns regarding additional plug plantings. There is no plan planting detail which depicts the number, type and location of the proposed plantings.
- Table 1 is not depicted as a table on the plan set, the words are copied and pasted.

**BSC Final Comment:**

BSC recommends that the Applicant provide a cross section of the replication area, identify the extent and type of vegetation alteration is proposed within the replication area and provide a separate planting plan illustrating the location, type and number of proposed plant species as well as describe the predicted water regime(s) within the replication area. This will allow us to review the proposed plantings with respect to the expected hydrology to determine if they are appropriate for the area. The proposed number and spacing of plantings may be

underestimated for the size of the mitigation area. The Massachusetts Inland Wetlands Replacement Guidelines ([Wetland Replacement Guidelines 2022 \(2\).pdf](#)) recommends plantings of trees/shrubs should be at least 24 inches in height. Shrubs should be planted no further apart than 8–10 feet on center, and trees should be planted no further apart than 10 –15 feet on center. BSC has designed and permitted numerous wetland mitigation designs for unavoidable impacts and understands the importance of providing sufficient detail and specifications for a contractor to construct a mitigation area without question. We also understand that field conditions at the time of installation may warrant planting substitutions based on plant availability, adjustments in grades to achieve the desired hydrology or adjustments to the location of plantings. BSC recommends that the mitigation design be conditioned such that any minor adjustment to any of the above-referenced conditions could be addressed by close coordination and communication between the Applicant and Applicants wetland representative and the Commission during construction rather than through an amended Order of Conditions Process.

We appreciate the opportunity to provide these comments and recommendations on the Prospect Hill Village NOI in Bellingham and look forward to discussing the peer review with the Commission at the next hearing. Should you have any questions regarding our review and provided comments, please do not hesitate to contact me at (617) 896-4534 or [pknapik@bscgroup.com](mailto:pknapik@bscgroup.com).

Sincerely,  
BSC Group, Inc.



**Paul M. Knapik**  
Sr. Wetland Scientist/Sr. Associate

Cc: Amanda Smith