

January 8, 2026
Bellingham Conservation Commission
10 Mechanic Street
Bellingham, MA 02019

Re: Response to B&T Peer Review Letter
Blackstone Street Improvements, Bellingham, MA 02019

Dear Bellingham Conservation Commission,

Goddard Consulting, LLC, (Goddard) is pleased to submit this response Letter on behalf of Wall Street Development (the Applicant), to provide responses to the Peer Review comments issued by Stacy Minihane and Thomas Michalak of Beals and Thomas, Inc., on December 5, 2025, in regard to the Notice of Intent filed for Blackstone Street improvements in Bellingham, MA. Goddard has provided responses to each comment in the following report.

The format of this report will be as follows:

Beals and Thomas, (B+T) Comments: *Italics*
Goddard Consulting (GC) Responses: **Bold**

MA DEP Technical Comments

B+T Comment: As indicated in our original comment, we agree with the Applicant regarding the lack of a distinguishable stream up-gradient of the road within the WF-A Series BVW given the ponded condition. Similarly, we agree that Bank and stream crossing performance standards are irrelevant if no work is proposed within the Bank/ stream as is represented on the plans.

GC 1. No response required.

B+T 2: This comment has been largely addressed by the Applicant.

However, we recommend that wetland soil parameters, pit and mound topography, and inclusion of non-living features (snags, woody debris, rock piles etc.) be considered for addition to the wetland replication plan.

The Applicant should also confirm that the wetland replication is sited outside of the intermittent stream channel (the full length of the stream is not depicted along the extent of the wetland replication area).

The seed mix noted in the Wetland Replication Planting Plan (dated April 14, 2025 by Goddard Consulting LLC) should be indicated on the planting plan Sheet C-12. Similarly, the instructional information in the Wetland Replication Planting Plan document should be incorporated as notes on the planting plan Sheet C-12. B+T Comment: We request that the Applicant provide a revised WPA Form3 itemizing resource area impacts with the revised plans as indicated by MassDEP above.

GC 2. Due to the relocation of the proposed wetland replication area, Goddard has revised the Wetland Replication Planting Plan and has included more info on soil parameters and non-living features have been added to the plan. In both the previous proposed replication area and the new location, they are

both outside the intermittent stream channel, the stream channel flows entirely interior to the BVW boundary. Sheet C-12 will be (or has been) updated with the requested information.

Site Visit and Application Comments

B+T 3. This comment has been addressed by the Applicant.

GC 3. No response required.

B+T 4. *We have not received the waiver request to review. It is our understanding that the waiver was not submitted to the Conservation Commission.*

GC 4. A waiver request has been submitted (12/7/2025) and we acknowledge that B+T has not reviewed the waiver request.

Plan Comments

B+T 5. *This comment has been addressed by the Applicant. However, please note Comment 15 relating to the culvert elevations.*

GC 5. See response to Comment 15 below.

B+T 6. *This comment has been addressed by the Applicant.*

GC 6. No response required.

B+T 7. *This comment has been addressed by the Applicant.*

GC 7. No response required.

B+T 8. *This comment has been addressed by the Applicant.*

GC 8. No response required.

B+T 9. *No further comment necessary, though we note to the Commission it may consider including a potential condition relating to erosion and sediment control monitoring.*

GC 9. No response required.

B+T 10. *This comment has been addressed by the Applicant.*

GC 10. No response required.

B+T 11. *Subsequent to our comment letter, we clarified via email that reference to a second culvert was based on information from the Applicant. This comment has been addressed by the Applicant.*

GC 11. No response required.

B+T 12. *Although it is generally good practice to provide sediment control barriers along the down-gradient limit of work to minimize the potential transport of sediment to undisturbed woodland, we acknowledge that it cannot be required by the Commission in areas outside of jurisdiction.*

GC 12. Allen Engineering will provide a response.

B+T 13. *This comment has been addressed by the Applicant.*

GC 13. No response required.

B+T 14. *The original comment has been addressed by the Applicant. However, we note the longitudinal slope of the box culvert is 4.41%, though the detail indicates 4%.*

GC 14. Allen Engineering will provide a response.

B+T 15. *Existing culvert information has been added to the plan. It is unknown to what extent the culvert is blocked vs. allowing some amount of water flow through, and accordingly, to what extent the current state of the culvert contributes to the vernal pool hydrology. This existing culvert appears to have an inlet invert elevation of 291.31. The new box culvert is proposed with an invert of 294.00, which could alter the hydrology, as the vernal pool could pond an additional 2.5+ feet in the post-development condition, since the existing culvert is being abandoned and its entire length will lie beneath the new road with no outlet.*

GC 15. The existing blocked culvert does not let any amount of water through it. We have been on-site multiple times when water was overtopping the roadway, and no water was flowing through the blocked culvert. The blocked culvert is the reason for the ponding of water north of the roadway and the invert of 294 was chosen because that is the elevation where it currently overtops the roadway. The hydrology of the vernal pool will not be affected by the proposed culvert, it actually maintains the current water level. If we chose to restore the existing culvert, the vernal pool hydrology would be significantly affected by reducing the water level by 2.5+ feet.

B+T 16. *The original comment has been addressed by the Applicant. However, we recommend that the Applicant specify how the existing culvert will be abandoned to avoid routing water underneath the road with no outlet.*

GC 16. The existing culvert will be dug up and completely removed. No water will be routed under the road with no outlet. The new culvert will be the only option for water to flow under the roadway. The old culvert should only be removed when no water is in the vernal pool.

B+T 17. *This comment has been addressed by the Applicant.*

GC 17. No response required.

B+T 18. *This comment has been addressed by the Applicant.*

GC 18. No response required.

B+T 19. *This comment has been addressed by the Applicant.*

GC 19. No response required.

B+T 20. *While the western end of the gabion was extended to the noted elevation, the eastern end has not.*

GC 20. Allen Engineering will provide a response.

B+T 21. *This comment has been addressed by the Applicant.*

GC 21. No response required.

B+T 22. *Our interpretation of the regulation is that spillways are to be hydraulically designed to pass flows tributary to the basin (ignoring detention; flow-in is equal to flow-out) with a minimum of 6" of freeboard between maximum flow elevation and the top of the berm. For a basin in failure, the assumption is that retained runoff will not draw-down within a reasonable period of time and the water surface elevation could reach the spillway after consecutive storms. Accordingly, we reiterate the intent of our original comment.*

GC 22. Allen Engineering will provide a response.

B+T 23. *Generally, infiltration basins are designed with outlets at lower stages (below the emergency spillway) to efficiently mitigate peak rates and retain the necessary recharge volume. The current design is wholly dependent on exfiltration, and the Applicant acknowledges the basins are accordingly oversized. We recommend there be a condition of approval for seasonal monitoring for a period of time after project completion to confirm the basins effectively dewater as designed. We acknowledge future development could warrant modifications to these basins.*

GC 23. Allen Engineering will provide a response.

B+T 24. *This comment has been addressed by the Applicant.*

GC 24. No response required.

B+T 25. *As noted in Comment 23, we recommend there be a condition of approval for seasonal monitoring for a period of time upon project completion to confirm the basins effectively dewater as designed.*

GC 25. No response required.

B+T 26. *This comment has been addressed by the Applicant.*

GC 26. No response required.

If you have any questions, please do not hesitate to reach out.

Sincerely,
Goddard Consulting, LLC



Scott Goddard, PWS, CWS
Principal



Ryan Roseen
Lead Wildlife Biologist