



ALLEN ENGINEERING & ASSOCIATES, INC.

Civil Engineers, Surveyors
& Land Development Consultants

January 22, 2026

Bellingham Conservation Commission
c/o Hannah Chace, Conservation Agent
10 Mechanic Street
Bellingham, MA 02019

Re: **Comment Responses**
Notice of Intent DEP File #105-0986
Blackstone Street Improvements
AEA Project - 00527

Dear Commissioners:

On behalf of the Applicant, Wall Street Development Corp., Allen Engineering & Associates, Inc. (AEA) is providing responses to comments prepared by the Commission's peer review consultant, Beals and Thomas, dated July 23, 2025. The following responses are intended to supplement comment responses issued by Goddard Consulting, LLC, dated January 8, 2026, in which Goddard indicated "Allen Engineering will provide a response".

Each of the comments are restated (*italicized*) with a response following in standard **bold** text.

Site Visit and Application Comments

12. *Sediment control barriers should be provided/extended to areas downgradient of proposed earthwork/trenching. For example, along the eastern perimeter of the drainage easement to Infiltration Basin 1, south of the roadway off-grading west of STA 7+00±, and around Infiltration Basin 2 and associated easement.*

AEA response: The sediment control barrier has been extended at Basin 1. All other recommended areas are far removed from any wetland resource areas and therefore do not warrant erosion controls.

B+T Comment: 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 it cannot be required by the Commission in areas outside of jurisdiction.

AEA Response: Due to the nature of the soil conditions, it is unlikely that sediment laden runoff will be transported off of the site. However, the Applicant will take this under advisement.

14. *The proposed 2-foot high box culvert (at STA 3+45) appears as if it will have one foot of substrate placed within (per the roadway profile and invert elevation). Please provide a construction detail specific to the culvert and confirm this is the intent. If so, this will leave a relatively shallow one-foot-high opening. Please provide an operation and maintenance plan outlining measures to keep*



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the culvert clear and functional in the wooded environment. It is also unclear how the substrate will be placed within the 37± foot culvert length, if that is the intent.

AEA response: There is no substrate proposed within the culvert. The profile view was simplified for clarity, which shows the left and right side of the culvert. A detail of the culvert has been added (see Sheet C-11).

B+T Comment: The original comment has been addressed by the Applicant. However, the longitudinal slope of the box culvert is 4.41%, though the detail indicated 4%.

AEA response: The culvert slope has been corrected in the detail on Sheet C-11.

20. *We request that the Applicant extend the ends of the gabion at Infiltration Basin 3 to the 291± contour elevation.*

AEA response: The gabion has been extended as requested.

B+T Comment: While the western end of the gabion has been extended to the noted elevation, the eastern end has not.

AEA response: The gabion (now an earthen berm) has been extended accordingly.

22. *Please confirm the emergency spillways are designed to pass the 100-year inflow rate with 6" of freeboard to the top of berm (i.e. basin in failure) in accordance with Bellingham Wetlands Regulation Section 247-33.B(4).*

AEA response: The basins have been designed such that the 100-year storm event will not reach the overflow spillway. In addition, AEA has provided analysis of the three basins "in failure" or only the spillway as an outlet and the results show that the peak ponding elevations still do not rise to the level of the spillways.

B+T Comment: Our interpretation of the regulation is that the 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 the 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.

AEA response: Each of the three basin spillways has been evaluated for a 100-year storm event while subtractive out any storage below the spillway elevation as suggested. In this extremely unlikely event, the results show that spillways are adequately sized. The calculation can be found in Section 3 of the revised Drainage Analysis Report.

23. *We request the Applicant consider proposing outlet control structures at each of the infiltration basins, in accordance with the MassDEP Stormwater Handbook. The design is dependent upon the infiltrative capacity of the soils. Under frozen/frost conditions, the basins may not dewater within 72 hours as required by the MassDEP Stormwater Management Policy.*



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AEA response: The basins have been designed with exfiltration and emergency spillways as their outlets. The result is a larger basin than if additional outlets were added. This conservative approach will allow for future outlet control structures to be inserted after the final development of the property has been designed.

B+T Comment: 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.

AEA response: Each of the three basins have been revised to include outlet control structures. This will ensure drawdown and that there will not be more than 5 feet of standing water within the basin. Construction details and the Drainage Analysis Report have been revised accordingly.

Please feel free to contact me at 508 381-3212 ext. 109 with any questions regarding this correspondence.

Sincerely,
**ALLEN ENGINEERING
& ASSOCIATES, INC.**

Michael J. Dryden, RLA
Senior Project Manager

Mark E. Allen, P.E.
President

Cc: Lou Petrozzi, Wall Street Development Corp., LLC