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August 29, 2025  
GZA Project No. 15.0167448.00

South Hadley Conservation Commission  
116 Main Street, Room U6  
South Hadley, Massachusetts, 01075

Re: Wetland Delineation Peer Review  
Request for Determination of Applicability and Associated Plan  
136 East Street, Map 35, Parcel 6  
South Hadley, Massachusetts, 01075

Dear Commission Members:

On behalf of the South Hadley Conservation Commission (SHCC) and in accordance with our contract, GZA is providing this Peer Review letter report in support of the SHCC review of a Request for Determination of Applicability Site Plan prepared by R. Levesque Associates, Inc. (RLA) for 136 East St, LLC. ("Applicant").

The South Hadley Conservation Commission is seeking a review of whether the identified boundaries of resource areas are accurately delineated at the parcel as submitted in a Request for Determination under the Wetlands Protection Act and South Hadley Wetland Bylaw.

R. Levesque Associates, Inc of Westfield, MA has submitted WPA Form 1 Request for Determination of Applicability and associated plan for a wetland delineation of Bordering Vegetated Wetland at 136 East Street in South Hadley, MA (Map 35, Parcel 6) on behalf of their client, 136 East St, LLC.

GZA was requested to review the materials submitted for accuracy and completeness with the requirements of the Massachusetts Wetlands Protection Act M.G.L. c 131, sec 40 and associated Regulations 310 CMR 10.00 and Local Wetland Bylaw (Chapter 240) and associated Regulations.

The primary focus of the RDA Peer Review is confirmation of wetland resource boundaries using a methodology that is consistent with the *Massachusetts Handbook for Delineating Bordering Vegetated Wetlands*, Second Edition, Jackson, S.D, D.J. Henson, D. Hilgeman, M. McHugh, and L. Rhodes, 2022, Boston, MA., Massachusetts Department of Environmental Protection, Bureau of Water resources, Wetlands Program; and *Corps of Engineers Wetland Delineation Manual, Environmental Laboratory. Technical Report Y-87-1*. U.S. Army Engineer Waterways Experiment Station, Vicksburg, MS; 2012 *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region*, ed. J.S. Wakely, R.W. Lichvar, and C. C. Noble; ERDC/EL TR-12-1. *Vicksburg, MS: U.S. Army Engineer Research and Development Center (Version 2.0)*.



Following our site observation on August 21, 2025, we offer our findings and recommendations to SHCC for your consideration as you review the above referenced RDA application.

Based on our review, we agree with the wetland flagging observed on the site and as presented in the associated RDA Site Plan that was provided by the Applicant.

### **Documents Reviewed for Preliminary Review**

As part of this Peer Review, we have reviewed several provided documents as well as online GIS data from the Massachusetts Global Information System (MassGIS) through the MassMapper online access portal. A list of materials reviewed is provided.

1. Request for Determination of Applicability (Bound Application, Narrative & Supporting Documents, prepared by R. Levesque Associates, Inc., Westfield, MA and dated July 21, 2025.
2. Wetland Determination Data Forms, prepared by R. Levesque Associates, Inc. and dated July 16, 2025.
3. Site Plan Entitled "Request for Determination of Applicability filing Plan" prepared for 136 East St, LLC at 136 East Street, South Hadley, MA, Map 35 Parcel 6. Prepared by R. Levesque Associates, Inc., Westfield, MA and dated July 21, 2025.
4. Desktop Review: MassGIS Data layers including DEP Wetlands, Hydrologic Connection, Orthographic images, NHESP layers, Soils, FEMA Floodplain, Areas of Critical Environmental Concern, Outstanding Resource Waters, and NWI Wetlands. The FEMA Flood Map Service Center, USDA Web Soil Survey, USGS Stream Stats, and Massachusetts Cultural Resource Information System.

### **Desktop Review**

GZA conducted a desktop review of the Site and areas immediately adjacent to the Site using publicly available databases including MassMapper, MACRIS, MassDOT, FEMA Maps, and Natural Resource Conservation Service Web Survey maps to assess if identified natural resources related or frequently reviewed restrictive features are present on the Site. **Table 1** lists the results of our review. Based on our review of publicly available data sources, GZA identified that the Site contains a MassDEP estimated Freshwater Emergent Wetland located to the north of the site and wooded deciduous swamp located in the central and eastern portion of site. A named perennial stream (Stoney Brook) is mapped by the USGS to the east of the parcel. Hydric soils are mapped within the eastern half of the parcel. The soils in the vicinity of the residence and yard on the parcel are mapped as prime farmland soils. FEMA 100-year floodplain is mapped in the eastern portion of the parcel. No additional environmentally regulated areas were identified based on our desktop review.

See **Table 1** for a summary of the regulated areas on the parcel.



**Table 1: Summary of Desktop Survey**

Resource	Present
Areas of Critical Environmental Concern (ACEC)	No
Outstanding Resource Water (ORW)	No
Priority Habitat for Rare and Endangered Species	No
Certified Vernal Pools	No
Open Space or Protected Land	No
DCR Trails	No
Mass Historic Commission Inventory	No
Cold Water Fisheries	No
Bank	Yes
Bordering Vegetated Wetland	Yes
Perennial Stream	Yes – outside of reviewed portion of parcel
Riverfront Area	Yes - outside of reviewed portion of parcel
FEMA Floodplain, 100-year	Yes
Prime Farmland Soils	Yes – western 1/3 of parcel
Mapped Hydric Soils	Yes
Surface Water Protection Areas	No
Wellhead Protection Areas	No

**On Site Review**

GZA conducted a single field review of the Site on August 21, 2025, to inspect the flagged wetland resources and to review upland areas of the parcel. The site was reviewed under drought free conditions.

The site contains a mixture of developed and undeveloped land. The front third (west) of the parcel contains a residence and associated yard. The middle third appears to have once supported agriculture, is now overgrown, and included a garage/barn and remnant old equipment. The eastern third is primarily forested and contains an intact deciduous floodplain forest. The parcel slopes down gradient to the east. A named perennial stream (Stoney Brook) is located east of the parcel.

The RDA plan shows that the site contains two areas of bordering vegetated wetland (BVW). One area located in the central portion of the site along the southern property line and the other running across the property in a roughly north to south orientation within the eastern third of the parcel. Internal to that wetland, areas of standing water and drainage patterns were observed.

GZA located all of the on-site wetland flags identified on the RDA plan. Some of the flags had detached from the vegetation that they were placed on originally, but their found location was generally consistent with the adjacent flags. GZA observed that the flags appear to be protective of the bordering vegetated wetland resource areas on site.

No additional areas of BVW or other wetland resource areas were identified upgradient of the flagged areas on the parcel.



## Jurisdictional Overview

**State Wetland Jurisdiction:** The wetlands observed include resource areas that are regulated under 1) Wetlands Protection Act (WPA), M.G.L. c.131 §40 and its companion regulations, 310 CMR 10.00 and 2) 401 Water Quality Certification (WQC) regulations, 314 CMR 9.00. The Conservation Commission is the Local Approving Authority to review permit applications under the WPA regulations which includes land within 100 feet of the wetlands (a.k.a. Buffer Zone).

**City of South Hadley Jurisdiction:** In addition to protection under the Wetlands Protection Act, portions of the Site are also protected by the City of South Hadley Chapter 240 Wetlands Bylaw. Areas subject to protection under the Bylaw include the establishment of a fifty-foot-wide “conservation zone”. Bordering Land Subject to Flooding does not have its own buffer zone under the current South Hadley Wetlands Bylaw.

## Review of Submitted Request for Determination of Applicability

GZA reviewed the RDA application to determine its completeness. R. Levesque Associates, Inc. submitted a RDA to the Town of South Hadley Conservation Commission on or around July 21, 2025, on behalf of the Applicant. The RDA requests a determination of whether the area depicted is subject to the jurisdiction of the Wetlands Protection Act and the Town of South Hadley Wetlands Bylaw and whether the boundaries of resource areas are accurately delineated. This request accurately corresponds with the WPA Form 1 C.1.a, b, and d boxes checked under the Determination section. The applicant has not proposed any work under the submitted Request for Determination of Applicability.

The property at 136 East Street, South Hadley is described as consisting of approximately 8.9-acres which include an existing house, barn, yard area, overgrown meadow and forest land. The topography at the site generally slopes downgradient to the east from the road with elevations ranging from 226 to 246 feet.

In the Wetland Resource Areas section, RLA identified two areas of on-site Bordering Vegetated Wetlands identified in the field with sequentially numbered flagging labeled “A-100 through A-111” and “W-1 through W-15”. In the A-series, flags A-100 and A-111 are located off-property and were not officially reviewed or confirmed as part of GZA’s assessment. Based on the topography, this section of BVW is presumed to continue off-property and connect to the W-series flags. In the W-series, flags 9 through 15 are located off-property and were therefore not reviewed. GZA notes that in addition to flag “W1”, there are also flags “W1A and W1B” noted on the site plans and on the property. RLA has identified in the narrative that a buffer zone extends into the site from the resource areas noted above and has included a 50-foot and 100-foot boundary.

RLA also identified that off-site Bank associated with small intermittent streams and the perennial stream Stoney Brook are located to the east of their reviewed section of the property. These areas were not field delineated. The narrative includes information by RLA that “the MAHW of Stony Brook is located greater than 300’ to the east of the delineated BVW boundary and therefore the 200’ Riverfront Area does not extend into the upland area of the property.” GZA reviewed this information in the field and concurs with RLA’s assessment.

The narrative identifies the presence of Bordering Land Subject to Flooding (BLSF) on the parcel and sites the review of the FEMA Flood Insurance Rate Map 2501700010A effective August 15, 1979, with a local mapped elevation of 219 feet. GZA reviewed the FIRMet and concurs that the mapped flood elevation is approximately 219 feet at the property. GZA also reviewed FEMA’s National Flood Hazard Viewer and confirmed that the 1979 map is the current map of record.



The Commission may wish to request additional information related to the following:

- The Form 1 reviewed by GZA did not appear to be signed by the Applicant and the Representative on Page 3 (8 of 30 within the submission package). GZA recommends that the Commission request a completed signature page for their records.
- Typically, GZA recommends that the Site location is added to the Flood Insurance Rate Map to clarify the parcel boundaries in relationship to potential adjacent mapped floodplain. GZA confirmed that the location shown on the FIRM panel is accurate and is not located within a FEMA 100-year floodplain. The Commission may wish to see this location identified during the public meeting.

### **Wetland Determination Data Form Review**

GZA reviewed the data forms associated with the RDA submission for their completeness and support of the wetland boundary determination. The data forms from 136 East Street were collected on July 16, 2025, and are associated with the wetland boundary near flag A-106/107. Several fields were observed to be not filled out on the data forms. These include the fields listed below along with GZA's observations:

#### T1-wet – Wetland Data Plot

- Latitude and Longitude were not included and therefore no datum information
- The NWI classification was not entered
- RLA checked the box for significantly disturbed vegetation and remarked that the understory had been cleared of shrubs. GZA confirms this observation.
- RLA also checked the box that "Normal Circumstances" were not present. The alteration of vegetation is a departure from normal circumstances at the site. GZA confirmed that the area was not within drought conditions at the time of the delineation.
- Under the Hydrology section, RLA checked off the presence of a "High Water Table (A2)" and noted the depth to water table and soil saturation was observed at 20". GZA disagrees that this observation meets the indicator criteria, however the observation of water-stained leaved and stunted or stressed plants would meet the Wetland Hydrology Indicator status.

GZA concurs with the data form that describes a location that does meet the criteria to be considered a wetland. The data omitted on the form would not result in a change to this finding.

#### T1-Up – Upland Data Plot

- Latitude and Longitude were not included and therefore no datum information,
- RLA checked the box for significantly disturbed vegetation and remarked that the understory had been cleared of shrubs. GZA confirms this observation.
- RLA also checked the box that "Normal Circumstances" were not present. The alteration of vegetation is a departure from normal circumstances at the site. GZA confirmed that the area was not within drought conditions at the time of the delineation.

GZA concurs with the data form describes a location that does not meet the criteria to be considered a wetland. The data omitted on the form would not result in a change to this finding.



## Peer Review Summary

The Site contains Local, State, and Federally regulated wetlands. The State regulated resources appear to be flagged accurately in the field and protective of the bordering vegetated wetland resource areas on site. No flag adjustments are suggested based on the field and Site Plan review. No additional upgradient wetland resource areas were observed on the parcel. Based on our desktop and material review along with field observations, the information as presented by RLA appears to accurately reflect the conditions on the reviewed portion of the parcel.

We sincerely appreciate this opportunity to be of service to the South Hadley Conservation Commission and if you should have any questions, please contact Joe Rogers at [joseph.rogers@gza.com](mailto:joseph.rogers@gza.com) or 413-218-2959.

Sincerely,  
GZA GeoEnvironmental, Inc.

A handwritten signature in blue ink that reads "Joseph Rogers".

Joseph Rogers, PWS, CESSWI  
Project Manager

A handwritten signature in blue ink that reads "Robin J. Casioppo".

Robin Casioppo, PWS, CWB, CESSWI  
Consultant Reviewer

A handwritten signature in black ink that reads "Stephen Lecco".

Stephen Lecco, AICP, CEP, PWS  
Associate Principal

Encl: Natural Resource Survey and Assessment Limitations



## USE OF REPORT

1. GZA GeoEnvironmental, Inc. (GZA) has prepared this report on behalf of, and for the exclusive use of Town of South Hadley Conservation Commission, ("Client") for the stated purpose(s) and location(s) identified in the report. Use of this report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not identified in the agreement, for any use, without our prior written permission, shall be at that party's risk, and without any liability to GZA.

## STANDARD OF CARE

2. GZA's findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Report and/or proposal, and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the data gathered and observations made during the course of our work. Conditions other than described in this report may be found at the subject location(s).
3. GZA's services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. No warranty, expressed or implied, is made.

## LIMITS TO OBSERVATIONS

4. Natural resource characteristics are inherently variable. Biological community composition and diversity can be affected by seasonal, annual or anthropogenic influences. In addition, soil conditions are reflective of subsurface geologic materials, the composition and distribution of which vary spatially.
5. The observations described in this report were made on the dates referenced and under the conditions stated therein. Conditions observed and reported by GZA reflect the conditions that could be reasonably observed based upon the visual observations of surface conditions and/or a limited observation of subsurface conditions at the specific time of observation. Such conditions are subject to environmental and circumstantial alteration and may not reflect conditions observable at another time.
6. The conclusions and recommendations contained in this report are based upon the data obtained from a limited number of surveys performed during the course of our work on the site, as described in the Report. There may be variations between these surveys and other past or future surveys due to inherent environmental and circumstantial variability.

## RELIANCE ON INFORMATION FROM OTHERS

7. Preparation of this Report may have relied upon information made available by Federal, state and local authorities; and/or work products prepared by other professionals as specified in the report. Unless specifically stated, GZA did not attempt to independently verify the accuracy or completeness of that information.

## COMPLIANCE WITH REGULATIONS AND CODES

8. GZA's services were performed to render an opinion on the presence and/or condition of natural resources as described in the Report. Standards used to identify or assess these resources as well as regulatory jurisdiction, if any, are stated in the Report. Standards for identification of jurisdictional resources and regulatory control over them may vary between



governmental agencies at Federal, state and local levels and are subject to change over time which may affect the conclusions and findings of this report.

#### **NEW INFORMATION**

9. In the event that the Client or others authorized to use this report obtain information on environmental regulatory compliance issues at the site not contained in this report, such information shall be brought to GZA's attention forthwith. GZA will evaluate such information and, on the basis of this work, may modify the conclusions stated in this report.

#### **ADDITIONAL SERVICES**

10. GZA recommends that we be retained to provide further investigation, if necessary, which would allow GZA to (1) observe compliance with the concepts and recommendations contained herein; (2) evaluate whether the manner of implementation creates a potential new finding; and (3) evaluate whether the manner of implementation affects or changes the conditions on which our opinions were made.