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November 14, 2025

Via email: rcornell@southhadleyma.gov

April Doroski, Chairperson
Town of South Hadley Conservation Commission
116 Main Street
South Hadley, Massachusetts 01075

RE: Response to MassDEP Comments (DEP File #288-0502)
136 East Street
South Hadley, Massachusetts 01075
(Map 35, Parcel 6)
RLA Project File No. 250511

Dear Chairperson Doroski and Commissioners:

On behalf of the applicant and property owner, 136 East St, LLC c/o Mr. Gerald Coderre, R Levesque Associates, Inc. is providing this response letter to MassDEP review comments issued for the above-referenced project. The review comment is presented below in *italic text*, followed by an RLA Response presented below in blue, boldface text. The comment number and format are consistent with the original document for ease of review.

[1] The project has been described in the NOI - Form 3 application as being a "Buffer Zone Only" project. When no other Resource Areas are within the Project Site and work is limited to the Buffer Zone(s), the Commission will center its review on the provisions seen at 310 CMR 10.53(1). In part, that section states... "Conditions may include limitations on the scope and location of work in the Buffer Zone as necessary to avoid alteration of Resource Areas. The Issuing Authority may require erosion and sedimentation controls during construction, a clear limit of work, and the preservation of natural vegetation adjacent to the Resource Area and/or other measures commensurate with the scope and location of the work within the Buffer Zone to protect the interests of M.G.L. c. 131, § 40.

RLA Response: Understood. The applicant is proposing work within the outer 100' buffer zone only. There is no work proposed within the 50' Conservation Zone as required under the Town of South Hadley local wetland bylaw. Erosion control measures and a defined limit of work are proposed and depicted on the site plan set for the Commission's review and approval. Open space is preserved and provided to the greatest extent feasible.

[2] Information regarding the field delineation of Bordering Vegetated Wetlands (BVW) does not

appear to accompany this submittal. These boundaries should be established through reference to 310 CMR 10.55(2)(c)2., and the companion Massachusetts Handbook for Delineating Bordering Vegetated Wetlands (DEP 2022, second edition). The Commission may ask for the submittal of properly prepared "Bordering Vegetated Wetland Determination Forms" (Appendix A's, or approved equivalent), as they are requisite for boundaries qualifying under 310 CMR 10.55(2)(c)2.

RLA Response: BVW data forms were provided to the Commission as part of the Request for Determination of Applicability (RDA) filing in August of 2025. The delineation of resource areas was peer reviewed by GZA and the applicant was ultimately issued a Positive 2a Determination of Applicability (DOA) by the Commission in September of 2025. The BVW data forms are attached hereto for reference.

[3] As mentioned in the project narrative, FEMA Flood Insurance Rate Maps indicate that the base flood elevation at the Project Locus is approximately 219' (NGVD29). It was unclear as to whether the vertical datum associated with the topographic survey was tied to the NGVD29 vertical survey datum. The applicant should provide the Commission with the applicable survey datum information used to establish the topographic elevations seen on the site plans. Please refer to 310 CMR 10.57(2) for specific boundary compliance requirements.

RLA Response: The topographic elevations shown on the existing conditions plan were based on the NAVD88 Datum. The NGVD29 Base Flood Elevation (BFE) of 219' was converted to the NAVD88 Datum with a BFE of 218.40'. The Existing Conditions Plan (Sheet EX-1) has been updated accordingly.

[4] The Commission may well evaluate the stormwater management system components of the project in relation to the Massachusetts Stormwater Management Standards, and as prescribed in 310 CMR 10.05 (6)(k). Please note that the plans submitted as part of the stormwater management report differ from the plan set bound under the cover sheet entitled "Deer Meadow Way". Of particular importance, the proposed grading found in the plans accompanying the stormwater management report suggest that the sump of the detention basin has a likelihood of intercepting the local groundwater table, as evidenced in the soil deep observation hole logs for pits numbered 8 - 10 suggesting an estimated seasonal high groundwater table to be at depths 24" - 26" below the surface. Proposed grades are shown approximately two below grade in the location of these test pits. While the primary TR-20 modeling inputs appear to be appropriate (please note, the Walpole soil series has a dual Hydrologic Soil Group (HSG) of B/D. HSG B is used in areas that are effectively drained, while the HSG D would be used in an undrained condition. HSG B is being applied in this submittal), the Commission may want to further examine this, TSS treatment trains, recharge calculations, etc. to ensure complete compliance with all Stormwater Management Standards. Any potential discrepancies should be addressed.

RLA Response: BETA has conducted a stormwater peer review for this project, and our office will address

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all stormwater related comments in an updated site plan set and stormwater report for the Commission's review.

Should you have any questions or comments regarding this information, please do not hesitate to contact our office at your earliest convenience.

Sincerely,
R LEVESQUE ASSOCIATES, INC.

Robert M. Levesque, RLA, ASLA
President

Enclosure(s)
BVW Data Forms

CC: MassDEP WERO (via email: Robert.VanDerKar@mass.gov)

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: 136 East Street City/County: South Hadley, Hampshire Sampling Date: 9/16/2025

Applicant/Owner: 136 East St, LLC State: MA Sampling Point: T1-Wet

Investigator(s): Ryan Nelson, R Levesque Assoc. Section, Township, Range: _____

Landform (hillslope, terrace, etc.): plain Local relief (concave, convex, none): concave Slope (%): 1-2

Subregion (LRR or MLRA): _____ Lat: _____ Long: _____ Datum: _____

Soil Map Unit Name: Walpole Sandy loam (31A) NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation X, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes _____ No X

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes X No _____	**Is the Sampled Area within a Wetland?** Yes X No _____
Hydric Soil Present?	Yes X No _____	If yes, optional Wetland Site ID: _____
Wetland Hydrology Present?	Yes X No _____	

Remarks: (Explain alternative procedures here or in a separate report.)

Understory has been cleared, no shrub layer

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- X High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- X Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- X Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes _____	No X	Depth (inches): _____
Water Table Present?	Yes X	No _____	Depth (inches): 20"
Saturation Present? (includes capillary fringe)	Yes X	No _____	Depth (inches): 20"

Wetland Hydrology Present? Yes X No _____

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION – Use scientific names of plants.

Sampling Point: T1-Wet

Tree Stratum (Plot size: 30')	Absolute % Cover	Dominant Species?	Indicator Status
1. Red Maple (Acer rubrum)	63	Y	FAC
2.			
3.			
4.			
5.			
6.			
7.			
	63	= Total Cover	

Sapling/Shrub Stratum (Plot size: 30')			
1. Honeysuckle (Lonicera morrowii)	10.5	N	FACU
2. Gray dogwood (cornus racemosa)	3	N	FAC
3.			
4.			
5.			
6.			
7.			
	13.5	= Total Cover	

Herb Stratum (Plot size: 10')			
1. Sensitive Fern (Onoclea sensibilis)	38	Y	FACW
2. Cinnamon fern (Osmundastrum cinnamomeum)	38	Y	FACW
3.			
4. Dogwood (Cornus amomum)	3	N	FACW
5. Ragweed (Ambrosia artemisiifolia)	3	N	FACU
6. Jewelweed (Impatiens capensis)	3	N	FACW
7. White ash (Fraxinus americana)	3	N	FACU
8. Goldenrod (Solidago gigantea)	3	N	FACW
9. Jack in the pulpit (Arisaema triphyllum)	3	N	FAC
10.			
11.			
12.			
	94	= Total Cover	

Woody Vine Stratum (Plot size: 10')			
1. Virginia creeper (Parthenocissus quinquefolia)	3	N	FACU
2. Asian Bittersweet	3	N	UPL
3. Poison Ivy (Toxicodendron radicans)	10.5	N	FAC
4.			
	16.5	= Total Cover	

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 3 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 100 (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species		x 1 =	
FACW species		x 2 =	
FAC species		x 3 =	
FACU species		x 4 =	
UPL species		x 5 =	
Column Totals:	(A)		(B)

Prevalence Index = B/A =

Hydrophytic Vegetation Indicators:

- ___ 1 - Rapid Test for Hydrophytic Vegetation
- X 2 - Dominance Test is >50%
- ___ 3 - Prevalence Index is ≤3.0[1]
- ___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)
- ___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

Tree – Woody plants 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/shrub – Woody plants less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes X No ___

Remarks: (Include photo numbers here or on a separate sheet.)

SOIL

Sampling Point: T1-WET

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

	Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
A/fill	0-8	10YR 3/2	100	-	-	-	-	Sandy loam	Potential historic fill
A/O	8-16"	10YR 2/1	100	10YR 4/1	20%	D	M	loam	mucky organic
Bg	16-20"+	10YR 6/1	100	10YR 5/4	10%	C	M	Sandy loam	

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. [2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
- ___ Black Histic (A3)
- ___ Hydrogen Sulfide (A4)
- ___ Stratified Layers (A5)
- ___ Depleted Below Dark Surface (A11)
- ___ Thick Dark Surface (A12)
- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
- ___ Stripped Matrix (S6)
- ___ Dark Surface (S7) (**LRR R, MLRA 149B**)
- ___ Polyvalue Below Surface (S8) (**LRR R, MLRA 149B**)
- ___ Thin Dark Surface (S9) (**LRR R, MLRA 149B**)
- ___ Loamy Mucky Mineral (F1) (**LRR K, L**)
- ___ Loamy Gleyed Matrix (F2)
- ___ Depleted Matrix (F3)
- X Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) (**LRR K, L, MLRA 149B**)
- ___ Coast Prairie Redox (A16) (**LRR K, L, R**)
- ___ 5 cm Mucky Peat or Peat (S3) (**LRR K, L, R**)
- ___ Dark Surface (S7) (**LRR K, L**)
- ___ Polyvalue Below Surface (S8) (**LRR K, L**)
- ___ Thin Dark Surface (S9) (**LRR K, L**)
- ___ Iron-Manganese Masses (F12) (**LRR K, L, R**)
- ___ Piedmont Floodplain Soils (F19) (**MLRA 149B**)
- ___ Mesic Spodic (TA6) (**MLRA 144A, 145, 149B**)
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes X No ___

Remarks:

WETLAND DETERMINATION DATA FORM – Northcentral and Northeast Region

Project/Site: 136 East Street City/County: South Hadley, Hampshire Sampling Date: 7-16-2025

Applicant/Owner: 136 East St, LLC State: MA Sampling Point: T1-up

Investigator(s): Ryan Nelson, R Levesque Assoc. Section, Township, Range: _____

Landform (hillslope, terrace, etc.): Plain Local relief (concave, convex, none): Convex Slope (%): 3-5

Subregion (LRR or MLRA): _____ Lat: _____ Long: _____ Datum: _____

Soil Map Unit Name: Walpole Sandy loam NWI classification: _____

Are climatic / hydrologic conditions on the site typical for this time of year? Yes X No _____ (If no, explain in Remarks.)

Are Vegetation X, Soil _____, or Hydrology _____ significantly disturbed? Are "Normal Circumstances" present? Yes _____ No X

Are Vegetation _____, Soil _____, or Hydrology _____ naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS – Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present?	Yes _____	No •	**Is the Sampled Area within a Wetland?** Yes _____ No X
Hydric Soil Present?	Yes _____	No X	
Wetland Hydrology Present?	Yes _____	No X	If yes, optional Wetland Site ID: _____

Remarks: (Explain alternative procedures here or in a separate report.)

Understory was mowed and lacks a shrub layer

HYDROLOGY

Wetland Hydrology Indicators:

Primary Indicators (minimum of one is required; check all that apply)

- ___ Surface Water (A1)
- ___ High Water Table (A2)
- ___ Saturation (A3)
- ___ Water Marks (B1)
- ___ Sediment Deposits (B2)
- ___ Drift Deposits (B3)
- ___ Algal Mat or Crust (B4)
- ___ Iron Deposits (B5)
- ___ Inundation Visible on Aerial Imagery (B7)
- ___ Sparsely Vegetated Concave Surface (B8)
- ___ Water-Stained Leaves (B9)
- ___ Aquatic Fauna (B13)
- ___ Marl Deposits (B15)
- ___ Hydrogen Sulfide Odor (C1)
- ___ Oxidized Rhizospheres on Living Roots (C3)
- ___ Presence of Reduced Iron (C4)
- ___ Recent Iron Reduction in Tilled Soils (C6)
- ___ Thin Muck Surface (C7)
- ___ Other (Explain in Remarks)

Secondary Indicators (minimum of two required)

- ___ Surface Soil Cracks (B6)
- ___ Drainage Patterns (B10)
- ___ Moss Trim Lines (B16)
- ___ Dry-Season Water Table (C2)
- ___ Crayfish Burrows (C8)
- ___ Saturation Visible on Aerial Imagery (C9)
- ___ Stunted or Stressed Plants (D1)
- ___ Geomorphic Position (D2)
- ___ Shallow Aquitard (D3)
- ___ Microtopographic Relief (D4)
- ___ FAC-Neutral Test (D5)

Field Observations:

Surface Water Present?	Yes _____	No X	Depth (inches): _____
Water Table Present?	Yes _____	No X	Depth (inches): _____
Saturation Present? (includes capillary fringe)	Yes _____	No X	Depth (inches): _____

Wetland Hydrology Present? Yes _____ No X

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION – Use scientific names of plants. Sampling Point: T1-UP

Tree Stratum (Plot size: 30')	Absolute % Cover	Dominant Species?	Indicator Status
1. White Ash (Fraxinus americana)	20.5	Y	FACU
2. Red Maple (Acer rubrum)	20.5	Y	FAC
3.			
4.			
5.			
6.			
7.			
	41	= Total Cover	

Sapling/Shrub Stratum (Plot size: 30')			
1. Honeysuckle (Lonicera morrowii)	20.5	Y	FACU
2.			
3.			
4.			
5.			
6.			
7.			
	20.5	= Total Cover	

Herb Stratum (Plot size: 10')			
1. Lady fern (Athyrium filix-femina)	3	N	FAC
2. Ragweed (Ambrosia artemisiifolia)	3	N	FACU
3. Jewelweed (impatiens capensis)	3	N	FACW
4. Garlic mustard (Alliaria petiolata)	3	N	FACU
5. Gray Dogwood (Cornus racemosa)	3	N	FAC
6. Flowering Dogwood (Cornus florida)	3	N	FACU
7. Pokeweed (phytolacca americana)	3	N	FACU
8. Lamb's quarter (chenopodium album)	3	N	FACU
9. Dewberry (Rubus flagellaris)	3	N	FACU
10. Nightshade (Circaea canadensis)	3	N	FACU
11. Red Maple (Acer rubrum)	10.5	N	FAC
12.			
	40.5	= Total Cover	

Woody Vine Stratum (Plot size: 10')			
1. Virginia creeper (Parthenocissus quinquefolia)	3	N	FACU
2. Poison ivy (Toxicodendron radicans)	10.5	N	FAC
3. Asian Bittersweet	10.5	N	UPL
4. Grapevine (Vitis labrusca)	10.5	N	FACU
Morning glory (Ipomoea purpurea)	3	N	FACU

Remarks: (Include photo numbers here or on a separate sheet) 37.5 = Total Cover

Area was mowed and plants are regenerating

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 3 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 33% (A/B)

Prevalence Index worksheet:

Total % Cover of:		Multiply by:	
OBL species	0	x 1 =	0
FACW species	3	x 2 =	6
FAC species	47.5	x 3 =	142.5
FACU species	78.5	x 4 =	314
UPL species	10.5	x 5 =	52.5
Column Totals:	139.5 (A)		515 (B)

Prevalence Index = B/A = 3.69

Hydrophytic Vegetation Indicators:

___ 1 - Rapid Test for Hydrophytic Vegetation

___ 2 - Dominance Test is >50%

___ 3 - Prevalence Index is ≤3.0[1]

___ 4 - Morphological Adaptations[1] (Provide supporting data in Remarks or on a separate sheet)

___ Problematic Hydrophytic Vegetation[1] (Explain)

[1]Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Vegetation Strata:

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Herb – All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vines – All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes ___ No X

SOIL

Sampling Point: T1-UP

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (inches)	Matrix Color (moist)	%	Redox Features Color (moist)	%	Type[1]	Loc[2]	Texture	Remarks
A 0-14	10YR 3/4	100	–	–	–	–	loamy sand	
Bw 14-20"+	10YR 5/4	100	–	–	–	–	"	Dry

[1]Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains.

[2]Location: PL=Pore Lining, M=Matrix.

Hydric Soil Indicators:

- ___ Histosol (A1)
- ___ Histic Epipedon (A2)
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- ___ Sandy Mucky Mineral (S1)
- ___ Sandy Gleyed Matrix (S4)
- ___ Sandy Redox (S5)
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- ___ Dark Surface (S7) **(LRR R, MLRA 149B)**
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- ___ Thin Dark Surface (S9) **(LRR R, MLRA 149B)**
- ___ Loamy Mucky Mineral (F1) **(LRR K, L)**
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- ___ Depleted Matrix (F3)
- ___ Redox Dark Surface (F6)
- ___ Depleted Dark Surface (F7)
- ___ Redox Depressions (F8)

Indicators for Problematic Hydric Soils[3]:

- ___ 2 cm Muck (A10) **(LRR K, L, MLRA 149B)**
- ___ Coast Prairie Redox (A16) **(LRR K, L, R)**
- ___ 5 cm Mucky Peat or Peat (S3) **(LRR K, L, R)**
- ___ Dark Surface (S7) **(LRR K, L)**
- ___ Polyvalue Below Surface (S8) **(LRR K, L)**
- ___ Thin Dark Surface (S9) **(LRR K, L)**
- ___ Iron-Manganese Masses (F12) **(LRR K, L, R)**
- ___ Piedmont Floodplain Soils (F19) **(MLRA 149B)**
- ___ Mesic Spodic (TA6) **(MLRA 144A, 145, 149B)**
- ___ Red Parent Material (F21)
- ___ Very Shallow Dark Surface (TF12)
- ___ Other (Explain in Remarks)

[3]Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

Restrictive Layer (if observed):

Type: _____

Depth (inches): _____

Hydric Soil Present? Yes _____ No X

Remarks: