



November 7, 2022

Town of Deerfield
c/o Deerfield Conservation Commission
8 Conway Street
South Deerfield, MA 01373

Re: ANRAD Peer Review – Off Greenfield Road Map 159, Lot 14 – 17.25 acres

Deerfield Conservation Commission:

FWS conducted a site visit of the above listed property on October 22, 2022, to review the delineated wetland resource areas and their regulatory designation. The regulatory areas as identified on the "Topographic Plan of Land in Deerfield, Massachusetts Franklin County", prepared by DGT Associates Surveying & Engineering, issuance date 8.24.22, sheets 1-6, herein referred to as the application plans. FWS has reviewed the entire Abbreviated Notice of Resource Area Delineation (ANRAD) application including the delineated regulatory boundaries and associated regulatory designation as they relate to the Wetland Protection Act Ch 131 § 40 and associated Regulations 310 CMR 10.00. This letter details our review observations and recommendations of all jurisdictional wetland resource areas associated with the subject property.

The following are comments and recommendations pertaining to the ANRAD application.

1. FWS notes the DEP Wetland Delineation Data Forms have been modified according to DEP's comment, FWS finds the data presentation accurate.
2. It is noted that the wetland boundary does not extend to the edge of the subject property in multiple locations along the northerly boundary. In addition, the southwest side of BVW J and F has not been delineated.

If the applicant does not wish to have these areas included in the Determination, it is recommended that the Deerfield Conservation Commission (DCC) clearly specified in the document that only areas delineated and depicted on the application plans are included as part of this Determination. This would also include intermittent streams/bank within wetland areas that have been stated to not be delineated.

3. Visual observations and culverts shown on the application plans, indicate that jurisdictional wetland resource areas are located on the east side of Route 5 and have not been shown on the application plans. It should be noted that the BVW buffer zone extends onto Route 5 from the subject site. However, the wetland buffer does not extend to Route 5 in the far northeast corner of the site. It is recommended that the wetlands on the east side of Route 5 be defined to depict the extent that regulated areas extend onto the subject site.

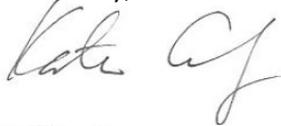
Furthermore, the tributary to Bloody Brook that continues along the east side of Route 5 and is indicated as perennial in jurisdiction according to topographic mapping. It is recommended that the jurisdictional status of this portion of the Brook be verified and mapped accordingly with any associated Riverfront Area which will likely extend onto the subject site.

If access for delineation and survey cannot be obtained, a visual approximation using mapping and field verification may be utilized to show the approximate extend of any jurisdictional areas extending from the east side of Route 5 onto the subject property.

4. It is recommended that BVW#G11A be added upgradient and between flags BVW#G11 and BVW#G12.
5. Please verify portion of ruts near BVW#G10 that are jurisdictional BVW, it appears that these may have been created post the initial delineation. Redoximorphic features, a low chroma matrix, and evidence of hydrology were observed in this area and should be included.
6. It is recommended that the BVW line be amended between BVW#J13 and BVW#J12 by adding flag BVWJ#12A in between these two flags and upgradient. Just below T1-P1.
7. It is recommended that the BVW line be amended to add flag BVW#21A between flags BVW#J21 and BVW#J22, approximately 5 feet upgradient of the existing line to include soils with prominent redoximorphic features.
8. An area of ponded water was noted within the wetland adjacent to BVW#F31, no clearly defined outlet was noted. Prior to any development application, FWS recommends that this area be evaluated during the spring season to see if it meets the criteria for a vernal pool. No action is recommended as part of this application.

Overall, the ANRAD, including field work was well presented and executed. As always, please feel free to contact me at 413-695-2195 or freshwaterwetland@gmail.com with any comments or questions.

Sincerely,



KATE BEDNAZ, PWS #1906
FRESHWATER WETLAND SERVICES
Registered Soil Scientist | President