March 14, 2022

MassDEP Northeast Regional Office
205B Lowell Street
Wilmington, MA 01887

Re: Information Request - Superseding Order of Conditions
42 Mill St., Westwood, MA (DEP #438-0706)

MassDEP Northeast Regional Office:

Goddard Consulting, LLC is pleased to submit this information requested by MassDEP through the Information Request dated 3/7/22, associated with the request for a Superseding Order of Conditions (SOC) on behalf of the applicant, Joanne Delapa, Delapa Realty Trust. Please note that in accordance with 310 CMR 10.05(7)(f)2, this information has been submitted to DEP within 70 days of their request, prior to the deadline of 5/16/22. Goddard Consulting provides the following responses to DEP's requests:

1. Sheet 1 of 3 entitled, "Proposed Site Plan of Land Lot 2B- Mill Street Westwood, Massachusetts", prepared by GLM Engineering Consultants, Inc., dated November 2, 2018 and revised January 31, 2022, proposes 285 cubic feet of fill in Bordering Land Subject to Flooding (BLSF) for portions of the proposed driveway. The project proposes 380 cubic feet of compensatory flood storage. However, the extent of the 100-year FEMA floodplain shown on the plan is inaccurate based on the latest available flood profile data prepared by FEMA. Additionally, the 100-year FEMA floodplain does not correspond to the existing topography referenced on the site plan. As a result, it appears there is additional BLSF fill proposed that is unaccounted for, due to the inaccurate 100-year FEMA floodplain depicted on the site plan.

Please note that the attached site plans have been revised to address the typo in which the on-site floodplain was previously listed as "Zone A" instead of the correct "Zone AE" in accordance with the latest available flood profile data prepared by FEMA. See attached FEMA FIRM Map.

Regarding the discrepancy in the floodplain corresponding with existing contours, this is due to the elevation of the floodplain gradually declining as the stream flows to the south. On-site survey data has been used to interpolate the intermediate flood elevations that were not shown on the FEMA map. We maintain that the extent of floodplain on-site is shown correctly, and therefore the extent of BLSF fill to be accurate as well.

2. The proposed fill in BLSF needs to be quantified and compensatory flood storage provided in conformance with performance standards described in 310 CMR 10.57(4)(a). Compensatory flood storage should be provided for all BLSF volume lost as a result of the project including the filling of BVW and adjacent floodplain areas.

As articulated above, the floodplain is shown correctly, as are the impacts to BLSF. Adequate compensatory storage has been included in accordance with 310 CMR 10.57(4)(a). For areas

outside of BVW within floodplain there will be 285cf of flood storage at elevation 193.5-194, with 380cf being compensated for at the same elevation. This results in a net increase of 95cf of storage.

310 CMR 10.57(2)(a) states that the boundary of BLSF extends from the wetland line of Bordering Vegetated Wetlands to the extent of the listed floodplain, as is correctly shown on the site plans. Impacts to the 550sf of wetlands are addressed in the 700sf of replication. The replication area will be graded down to elevation 192, commensurate with the elevation of the surrounding BVW system to satisfy flood storage requirements. The construction of the replication area will result in an additional 150sf of flood storage on-site as compared to the existing conditions.

If there are any questions concerning this request, please do not hesitate to contact us.

Sincerely,

Goddard Consulting, LLC

Scott Goddard, Principal & PWS
Professional Wetland Scientist