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April 22, 2013

Amesbury Conservation Commission and Mr. John Lopez  
Amesbury Conservation Commission  
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RE: Bailey's Pond Notice of Intent Peer Review

Dear Mr. Lopez and Members of the Commission:

BSC Group, Inc. (BSC) is pleased to submit this wetland resources peer review report on the proposed Village at Bailey's Pond (Route 150 and Summit Avenue) Notice of Intent (NOI). Oak Consulting Group (OCG) and Hughes Environmental Consulting (HEC) have submitted a letter response (dated 2/19/2013) to the Amesbury Conservation Commission (ACC) on behalf of Fafard Real Estate and Development Corporation. The 2/19/2013 letter is in response to BSC peer review comments contained in a letter dated 1/29/2013. The 2/19/2013 OCG/HEC letter indicates that the Applicant wishes to determine the site's status with regard to "previously developed and degraded riverfront" per Wetland Protection Act regulations 310 CMR 10.58(5). As the Applicant has not previously identified the site in this manner, an additional site visit was required to assess the site in this regard. Due to snow cover/frozen ground conditions, a site visit could not be scheduled until April 3rd, 2013. This letter report discusses the findings of the site visit, as well as other issues identified in the OCG/HEC letter of 2/19/2013.

Additionally, this report refers to project information provided in the project NOI (filed 4/15/2010), in revised supporting materials (dated 10/27/2011 and 1/14/2013) and on project plans titled The Village At Bailey's Pond (Site Plan), dated 9/30/2011 and revised 12/07/2012.

The purpose of this assessment is to evaluate project compliance with the Massachusetts Wetlands Protection Act (M.G.L. c. 131, s. 40) (WPA) and associated regulations (310 CMR 10.00 et al.) and the City of Amesbury Wetland Protection Ordinance and associated regulations (Ordinance). The delineation of Bordering Vegetated Wetlands (BVW) was evaluated earlier in the peer review process according to the MA Department of Environmental Protection "Handbook for Delineating Bordering Vegetated Wetlands Under the MA Wetlands Protection Act". Regulated resource areas on the subject property include BVW and associated Buffer Zone, Bank, Isolated Vegetated Wetland (IVW), Land Under Water, and Riverfront Area (RA). Regulated resources were assessed according to definitions in the Ordinance and in the state WPA regulations.

Engineers  
Environmental Scientists  
GIS Consultants  
Landscape Architects  
Planners  
Surveyors

April 3rd, 2013 Site Visit

Sean Malone (OCG), Tom Hughes (HEC), Jack Tremblay (Amesbury Conservation Commission (ACC)) and Gillian Davies (BSC) attended the site visit on 4/3/2013, although Mr. Malone and Mr. Tremblay were only able to be present for a portion of the site visit due to time constraints.



1. Absence of Topsoil status:

The Applicant wishes to claim "absence of topsoil" status for much of the area within the RA on the project site. In order to investigate this claim, BSC dug a total of 11 soil pits and 1 augur hole (approximately 9 - 14" deep) at various locations (see attached soil log and sketch plan) within the portion of the RA on the site where the Applicant wishes to claim "absence of topsoil" status.

Although neither the WPA nor the WPA regulations (310 CMR 10.00 et al), nor the City of Amesbury Ordinance define the term "topsoil", soil scientists and the literature of soil science generally consider topsoil to be synonymous with the A horizon, which is defined as:

Mineral soil, formed at the surface or below an O horizon, little remnant rock structure, and one or more: 1) accumulation of humified organic matter but dominated by mineral matter, and not dominated by E or B horizon properties; 2) properties resulting from cultivation, pasturing, or similar disturbance; or 3) morphology resulting from surficial processes different from the underlying B or C."<sup>1</sup>).

The Society of Soil Scientists of Southern New England (SSSSNE) references the nesoil.com website and its Glossary of Soil Science Terms as an up-to-date source of technical soils information and definitions of terms. The Glossary of Soil Science Terms at nesoil.com as well as the "Middlesex County Massachusetts Interim Soil Survey Report" (1995) and the "Soil Survey of Worcester County, Massachusetts, Southern Part" (1998) by the United States Department of Agriculture, Natural Resources Conservation Service, provide the following definition of topsoil:

The upper part of the soil, which is the most favorable material for plant growth. It is ordinarily rich in organic matter and is used to topdress roadbanks, lawns, and land effected by mining.

It should be noted that the SSSSNE website specifically associates topsoil with the A horizon. It should also be noted that the SSSSNE website includes a discussion of A horizons that mentions that if an A horizon is more than 2 or 3 inches thick, it has probably been plowed, thereby indicating that relatively thin horizons can be identified as A horizons, as well as indicating that A horizons are also known as topsoil.

The "Soil Survey of Essex County, Massachusetts, Northern Part" (1981) provides the following definition of topsoil:

Presumably a fertile soil or soil material, or one that responds to fertilization, ordinarily rich in organic matter, used to topdress roadbanks, lawns and gardens.

This definition is very similar to the non-agriculturally oriented topsoil definition (definition (ii)) found at the Soil Science Society of America's Glossary of Soil Science Terms:

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<sup>1</sup> Field Book for Describing and Sampling Soils, Version 3.0. September 2012. p. 4-1. National Soil Survey Center, Natural Resources Conservation Service, U.S. Department of Agriculture.



**topsoil** (i) The layer of soil moved in cultivation. Frequently designated as the Ap layer or Ap horizon. (ii) Presumably fertile soil material used to topdress roadbanks, gardens, and lawns.

It should be noted that neither the definition for topsoil, nor the definition for an A horizon, specify a minimum required depth. Rather, the characterization is based on the qualities of the soil with regard to a combined presence of mineral and organic material, and typical location at the surface. Topsoil is considered to be material that is qualitatively favorable for plant growth (presence of roots and vegetation being confirmation of favorable status for plant growth).

Method:

Soil Pits 1, 4, 5, 6, 7, 9, 10, 11, and 12 were dug in currently vegetated areas. All of these areas except for Pit 5 are forested. Pit 5 is in an area with herbaceous and shrub vegetation. All of these pit locations had a normal leaf litter layer above the soil material. Pits 2 and 8, as well as August 3, were dug in existing footpaths that are currently unvegetated and receive ATV traffic. However, Pit 8 was dug in a location where rooting structure remains within the path.



Pit 5 was dug in the vegetated circle inside the trails, just in front of the shrub. This area is less well vegetated than much of the site, but does exhibit topsoil/A horizon.

Results:

The dark brown colors observed in the topsoil/A horizon that was observed in Pits 1, 4, 5, 6, 7, 8, 9, 10, 11, and 12 indicate the presence of organic material. Soil textures were in the sandy loam to loamy sand range, indicating the presence of a mineral component. Each of these pits included many fine to medium roots within the topsoil/A horizon, indicating that the soil material is favorable for plant growth, and that topsoil has developed in place. Material located below the dark brown topsoil/A horizon contained colors indicative of a reduced organic matter content, as is typical for horizons beneath the surface horizons. It should be noted that the presence of vegetation and rooting within the topsoil/A horizon help confirm the presence of topsoil, as "most favorable material for plant growth" is part of the definition of topsoil.



Conclusion:

BSC concludes that topsoil/A horizon is present in all of the locations represented by Pits 1, 4, 5, 6, 7, 8, 9, 10, 11, and 12. 100% of the vegetated locations contained topsoil/A horizon, as one would anticipate. In addition, Pit 8 contained topsoil/A horizon, despite being located in a footpath. The texture of the topsoil/A horizon at Pit 8 was sandy loam, and extensive rooting was present. It is BSC's opinion that the topsoil/A horizon has been able to remain in this footpath due to the finer texture of the soil and the root structure. Contrasting these results, Pit 2 and Augur 3 exhibited an absence of topsoil/A horizon. These locations are in a footpath that is clearly heavily used and eroded by ATV traffic, and has loamy sand texture. The coarser texture combined with the ATV traffic has likely resulted in topsoil/A horizon being more easily eroded. Minimal or no roots were observed in these two excavations.

While significant portions of the RA on the project site appear to have been mined for sand and gravel (based on aerial photograph and OCG/HEC comments) many decades ago, it also appears that the RA has recovered from that disturbance in the intervening time (see photographs under #2 below), and has become a largely forested area since then, with a functioning RA, herbaceous, shrub and tree layers, and development of topsoil/A horizon with extensive rooting. Following re-establishment of vegetation and topsoil/A horizon, trails have been installed on the site. In some trail locations, the over-use of the trails by ATVs has resulted in the erosion of the topsoil/A horizon. In these specific locations, BSC finds that the "absence of topsoil" criteria can be met. In vegetated areas, and in some of the trail areas, topsoil/A horizon occurs. In some locations, the topsoil/A horizon may be fairly shallow, ranging from 0.5 - 2" within a given pit, but it is present. The criteria listed at WPA regulations 310 CMR 10.58(5) requires a complete absence of topsoil material. BSC observed that the "absence of topsoil" criteria is clearly *not* met where vegetation is present, and in some of the trail areas, within the RA on this project site.

The Applicant should field-delineate the footprint of the areas within RA that truly exhibit a complete absence of topsoil, such as those observed at Pit 2 and Augur 3.



Sandy trails, heavily used by ATV's, were observed to lack topsoil/A horizon. Vegetated areas adjacent to sandy trails were observed to contain topsoil/A horizon.



2. Abandoned Dumping Grounds status:

The Applicant has claimed that the site is "Abandoned Dumping Grounds" (ADG) per WPA regulations 310 CMR 10.58(5). ADG is not defined in the WPA regulations. However, BSC understands (personal communication, DEP, Heidi Davis, 2/18/2013) that DEP does not consider the presence of debris that is easily carried away to constitute ADG. The following photographs document the typical conditions of the RA on the project site. The area is utilized by paintball enthusiasts, and paintball nests have been installed in a few locations. Additionally, there is some trash/debris, such as tires and a wood pallet. All of these may be carried away fairly easily, and the vast majority of the RA is not impacted by this debris. BSC does not consider the project site RA to qualify as ADG.



RA on north side of stream, with paintball nest and some debris



RA on north side of stream, looking towards culvert



Trail and forested area on north side of stream



Perennial stream with some debris (pallet, tire) and trees downed by beavers



Trail on south side of stream, with paintball nest



Paintball nest on south side of stream



Trail and forested area on south side of stream

**3. Project Site RA status as degraded or previously developed area:**

BSC concurs with the Applicant that some portions of trail within the RA completely lack topsoil/A horizon material. These areas meet the "absence of topsoil" criteria, and therefore, can be regarded as currently degraded. The Applicant should field-delineate these areas, as they are eligible for reuse/redevelopment under WPA regulations 310 10.58(5).

With regard to the remaining RA areas on the project site, BSC finds that remaining areas contain topsoil, are pervious, provide Riverfront Area functions (wildlife habitat, hydrologic functions, prevention of pollution, protection of fisheries), and do not qualify as ADG. Additionally, most of the remaining areas (i.e. non-trail areas) are well vegetated, adding to their functionality and demonstrating suitability for plant growth. Consistent with past DEP decisions (see below), BSC believes that these remaining areas should be regulated under 310 CMR 10.58(4) performance standards, and not under 310 CMR 10.58(5) performance standards. Past DEP decisions clearly state that locations on a site that exhibit topsoil/A horizon material are not considered to be currently degraded and do not meet the "absence of topsoil" criteria. In assessing sites, DEP also considers the functionality of the RA and whether or not it is vegetated. In neither case cited below, did DEP find that locations with



topsoil, vegetation, and RA functionality could be regulated under 310 CMR 10.58(5). In both cases, they required that such areas be regulated under 310 CMR 10.58(4). BSC observes that the Bailey's Pond RA has characteristics similar to, or more ecologically intact (greater topsoil development and vegetative development) than, the RA's that DEP required to be regulated by 310 CMR 10.58(4).

In the Superseding Order of Conditions (dated 12/29/1999) for DEP File #219-642, 596 Lowell Street, Methuen, DEP states:

Given both presence of topsoil and vegetative cover, the Department found, that although the site was previously developed as a drive-in movie theatre, it is not currently degraded except for the two small areas of existing pavement. The letter stated that since the Department does not consider the project to be redevelopment, the plans needed to be revised to meet the performance standards under 310 CMR 10.58(4).

In the Information Request letter (dated 5/4/2000) for DEP File #209-295, Crystal Motor Express, 10 Kimball Lane, Lynnfield, DEP states:

Although the area had previously been altered, the current soil shows a nascent A horizon (topsoil) with roots growing to a depth of approximately 7 inches. This Riverfront area currently functions to serve at least some of the interests of the Wetlands Protection Act regulations, including groundwater recharge and wildlife habitat.

Consequently, the Department has determined that the project as currently proposed does not meet the performance standards of 310 CMR 10.58(5). Specifically, although the site was previously-developed as a grassed horse track, because of the clear presence of topsoil in our test pit, combined with the fact that the site is well vegetated, we do not find that the riverfront area is currently degraded. The existing paved area of Kimball Lane does qualify as degraded.

In the 1/17/2001 Superseding Order of Conditions for this project, DEP stated:

After the site visits, the Department sent an information request letter to you stating that although the site was previously filled for the construction of a grassed horse track, it does not meet the definition of degraded Riverfront Area under 310 MR 10.58(5). It does not meet the definition because it is vegetated, pervious, and contains topsoil. The letter stated that since the Department does not consider the project to be redevelopment, the plans needed to be revised to meet the performance standards under 310 CMR 10.58(4).

Additionally, in the 4/29/2004 Superseding Order of Conditions (SOC) for DEP File #36-833 in Ipswich, DEP states:

...the Department concurs **that the only degraded portion of the proposed project is the parking lot on Lot 5.** As "**Redevelopment**" means replacement, rehabilitation, or expansion of existing structures, improvement of existing roads, or **reuse of degraded or previously-developed areas**, and the work proposed on Lot 6A is neither degraded nor previously-developed, it cannot enjoy the benefits of the



310 CMR 10.58(5) and must meet the performance standards of 310 CMR 10.58(4)...projects proposed as Redevelopment projects under 10.58(5) must pass two tests: 1) they must meet the definition of Redevelopment as described in the first paragraph of 10.58(5), and 2) they must fulfill ALL of the criteria (a) - (h) of 10.58(5).

In the paragraph above, DEP identifies the parking lot on Lot 5 as the only degraded portion of the proposed project, implying that it is the only area eligible to meet the definition of Redevelopment. Later in the same SOC, DEP states that, "...apart from the problem with Lot 6, the remainder of the project fulfills the criteria contained in 10.58(5) by dint of the large amount of restoration proposed." This statement suggests that DEP views the amount of mitigation/restoration proposed for this project to meet the criteria at 10.58(5)a, f and/or g. However, DEP does not explain how the proposed project would meet the definition of Redevelopment, particularly since earlier in the letter, DEP has stated that only the parking lot on Lot 5 meets the definition of degraded. It would appear that interpreting any other portion of Lot 5 as degraded would contradict both DEP's own assessment in this SOC, as well as earlier SOCs cited above.

The Applicant has cited a Decision and Order on Motions to Strike and For Directed Decision (Decision) (Wilmington, "In the Matter of Edward T. McLaughlin, Trustee, Elm Realty Trust") for DEP File #344-635, Docket # DEP-05-1224, dated 6/21/2006 in support of their request for the site to be considered under 310 CMR 10.58(5). It is BSC's understanding that this decision is not final, and that it is not appropriate at this time to use it as a reference for decisions (personal communication, DEP, Jill Provencal, Feb/March 2013). That said, BSC finds reference to DEP's understanding of appropriate implementation of 310 CMR 10.58(5) in the Decision, as follows.

Jill Provencal's opinion that only the foundation, which comprised block walls, and the area immediately adjacent to it, which contained "a fill material of sand and gravel that is not supporting a significant amount of vegetation or performing functions of a Riverfront Area", qualified as previously-developed riverfront area. That was because...the MassDEP does not consider work proposed on areas with existing vegetation or lawns as work that is being done on degraded areas...(it) does not consider existing vegetated areas on these sites, that are providing functions important to Riverfront Areas, such as wildlife habitat, as degraded and therefore a project proponent cannot claim that redevelopment standards of the wetlands regulations should be applied to those areas...Based on her opinion that "a majority of the project site is functioning as a Riverfront Area," Provencal also opined that the proposed project would not improve existing conditions within it, particularly since the project would replace existing conditions with "a paved impervious parking lot over a significant portion of the site, that currently contains abundant vegetation."

Although the Decision is not final, BSC notes that the DEP ALJ attorney, in concluding that an "absence of topsoil" exists, is relying on an opinion from a soil evaluator who has not provided the type of data necessary to determine whether or not topsoil exists. The soil evaluator expresses an opinion, and appears to base his opinion on his own soil data logs. These logs (contained in the footnotes to the Decision) contain information pertaining to soil texture and location of water table, and do not contain further soils information that soil scientists typically collect when determining presence or absence of topsoil/A horizon, such



as soil color. The level of information provided in the soil evaluator's soil logs is insufficient for an assessment of presence/absence of topsoil, and yet, the DEP ALJ attorney appears to base his opinion on it.

Earlier in this project's history, the Wilmington Conservation Commission had employed a certified and registered soil scientist to evaluate the site. This soil scientist (Art Allen) collected soil color information and information about plant rooting and earthworm presence, thus allowing him to verify the presence of topsoil using appropriate technical soil science criteria. His assessment was consistent with the DEP Environmental Analyst's opinion. He observed that topsoil was present with the exception of the area within the limits of the foundation on the site. BSC concludes that the information and expertise provided by the soil scientist supports the DEP Environmental Analyst's opinion, and the DEP ALJ's opinion is unsupported by valid soil data with regard to determining presence or absence of topsoil.

#### 4. Conclusions regarding Riverfront Area

BSC site investigations lead BSC to conclude that the project site is not ADG and does contain topsoil in vegetated areas and portions of the trail system. There are specific portions of the trail system that lack topsoil, and thereby qualify as degraded. These areas should be field-delineated, and would be regulated under 310 CMR 10.58(5). The remainder of the site is not currently degraded, contains topsoil, is largely well vegetated, and functions as RA. Consistent with past DEP decisions, BSC concludes that these areas should be regulated in accordance with the Performance Standards set forth at 310 CMR 10.58(4).

#### 5. Discussion regarding Mitigation:

In the event that the areas containing topsoil and existing vegetated (largely forested) functioning RA were to be determined to be degraded and eligible for review under 310 CMR 10.58(5), it is BSC's opinion that the Applicant's current project design and proposed mitigation do not meet the mitigation requirements established at 310 CMR 10.58 (5), particularly since a relatively significant amount of the RA would be impacted by proposed development.

Additionally, the Applicant states that the amount of proposed RA impact exceeds the area of RA in the Applicant's "Area 3", which is the area they calculated to be unvegetated by interpreting aerial photography. BSC has observed that a portion of the unvegetated trail area has no topsoil, and a portion of it does contain topsoil, so the area of land devoid of topsoil is less than the area estimated by the Applicant under their "Area 3" calculation, and should be field-delineated. Hence, even if the project were being reviewed under 310 CMR 10.58(5) (and BSC's opinion is that the project is not eligible for this), the project likely would not be in compliance with 310 CMR 10.58(5)(e), which requires:

The area of proposed work shall not exceed the amount of degraded area, provided that the proposed work may alter up to 10% if the degraded area is less than 10% of the riverfront area, except in accordance with 310 CMR 10.58(5) (f) or (g).

Assuming that BSC is interpreting the Applicant's impact table ("Calculations of square footage of conditions within the RA", in 2/19/2013 letter) correctly, the Applicant appears to be saying that there will be 30,694 sf of impact to RA, (but this may not include paved surfaces) and that the total RA in "Area 3" is 15,734 sf. The Applicant's tables are not clear, as another table listed under "2012 Alternative" lists an apparent total RA impact of 31,062



sf (including temporary impacts), and yet another table listed under "Alternative Riverfront Impacts Summary Table" lists a total RA impact of 32,787 sf under the 2012 alternative. These tables appear to be inconsistent with each other. The Applicant should verify which is correct, and should produce a correct table that contains all types of impacts to the RA.

The Applicant's proposed mitigation includes:

- placing additional topsoil on top of existing soils, which, in many areas already contain functioning topsoil (of varying thicknesses)
- removal of invasive species
- planting of native species
- restoration of an IVW
- restoration/stabilization of a section of eroded stream bank
- removal of debris
- grading to reduce runoff and increase infiltration (this would also result in soil disturbance and compaction, as well as possible loss of native vegetation)

While these actions are likely to have some ecological benefit, it is not clear that they would improve conditions to a degree that would offset installation of impervious surfaces and conversion of naturally vegetated forested land to land altered for development. Grading could have some potential negative consequences, depending on the location of the grading. Proposed development is of such a scale that wildlife habitat function in the RA may be impaired due to impairment of wildlife movement, as well as the direct loss of wildlife habitat and other RA functions.

#### **6. Alternatives Analysis:**

The Applicant has provided information with regard to an Alternatives Analysis, however, BSC has a number of comments:

- the on-site alternatives analysis does not provide sufficient documentation for the necessity of the proposed activities within the RA. BSC recommends that the Applicant further assess an alternative for developing the site that would keep all development, with the exception of activities allowable under 310 CMR 10.58(4), outside of the RA.
- The Applicant should document the necessity for stormwater structures within the RA, as stormwater structures should be kept out of RA unless there is no practicable alternative or the stormwater structures are necessary to meet performance standards for other resource areas ((310 CMR 10.58(4)(d)).
- All alternatives should include an assessment of costs under 310 CMR 10.58(4)(c). The February 2013 Supplemental Alternatives Analysis makes a statement that removing the building and impervious area from the RA are not practicable and substantially (economically) equivalent, but no information is provided with regard to costs. The cost of an alternative is a discrete part of the definition of "practicable". As noted at 310 CMR 10.58 (4) (c) 1: Definition of Practicable. An alternative is practicable and substantially equivalent economically if it is available and capable of being done after taking into consideration costs, existing technology, proposed use, and logistics, in light of overall project purposes.
- A statement is made that reducing the number of buildings is not consistent with the project purpose. Under 310 CMR 10.58(4)(c)1, project purpose, "...shall be defined generally...(e.g. residential subdivision, expansion of a commercial



- development)", such that number of buildings is not included in "project purpose".
- Site plans showing the alternatives are not labeled to indicate which alternative they are showing, and this should be provided.

The table titled "Calculations of square footage of conditions within the Riverfront Area" should be revised after areas qualifying for "absence of topsoil" have been field-delineated. The table should indicate whether the terms "degraded" and "disturbed" are referring to pre or post construction conditions, and types of impacts should be clearly identified.

Following further development of the alternatives analysis, and maximization of the avoidance and minimization of impacts, mitigation measures for the chosen alternative should be further examined. At this point, it is premature to fully evaluate mitigation measures, as impacts have not been fully clarified through a complete alternatives analysis process.

#### 7. Ordinance:

The Applicant should confer with the City of Amesbury to determine whether or not the proposed sewer pipeline constitutes a "structure" under the Ordinance.

The Applicant should provide documentation with regard to Ordinance regulations Part II, Section 12.0, that the proposed work, "...will not have a significant or cumulative detrimental effect upon Resource Areas or their wetland values protected herein...Failure to provide adequate evidence to the Commission supporting this burden shall be sufficient cause for the Commission to deny the proposed project."

The Applicant should provide a thorough alternatives analysis, including an alternative that removes development from the RA, except for that which is allowed under 310 CMR 10.58(4), so that the Amesbury Conservation Commission can evaluate project alternatives with regard to Ordinance Section 460-5 D. Proof, particularly (4), which implies the necessity of an alternatives analysis in order to achieve Ordinance compliance:

The Commission shall regard as practicable an alternative which is reasonably available and capable of being done after taking into consideration the proposed property used, overall project purpose (e.g. residential, institutional, commercial or industrial), logistics, existing technology, costs of the alternatives and overall project costs.

#### 8. Erosion Control, Pollution Prevention Plan, Construction Sequencing Plan, Operation & Maintenance Plan:

With regard to potential impacts to wetland resources, comments on these elements of the proposed project are better made when the Alternatives Analysis has been completed and a preferred Alternative has been chosen based on the results of the Alternatives Analysis, as comments at this level of detail are premature until a more definitive preferred Alternative has been identified. However, BSC does recommend that as the Applicant develops further plans for the site, that they incorporate a phased approach to construction sequencing, and use best management practices with regard to erosion and sedimentation control, so as to reduce the risk of potential erosion and sedimentation impacts to wetland resources. Given the sandy and erodible nature of some of the soils on the site, a phased construction sequence



and implementation of erosion and sediment control best management practices will be especially beneficial in helping to prevent construction phase impacts to wetland resources.

The Commission should feel free to contact me at (617) 896-4524 (office) or (978) 621-8783 (cell) with any questions regarding this report and this letter report.

Sincerely,  
BSC Group, Inc.

Gillian T. Davies  
Senior Wetland/Soil Scientist

cc: Ingeborg Hegemann, BSC Group, Inc.

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