

## **MEMORANDUM**

June 6, 2025

**To:** Alison Manugian, Dracut Community Development Director  
**From:** James Thorne, PE, Business Manager IV  
Sam Spelman, Scientist II  
**Date:** June 6, 2025  
**Project Name:** Dracut CC TO 2041 Bridge Street Peer Review  
**Project Number:** Green No. 24016.06XX  
**Subject:** Field Review of Wetland Delineation at 2041 Bridge Street, Dracut, MA

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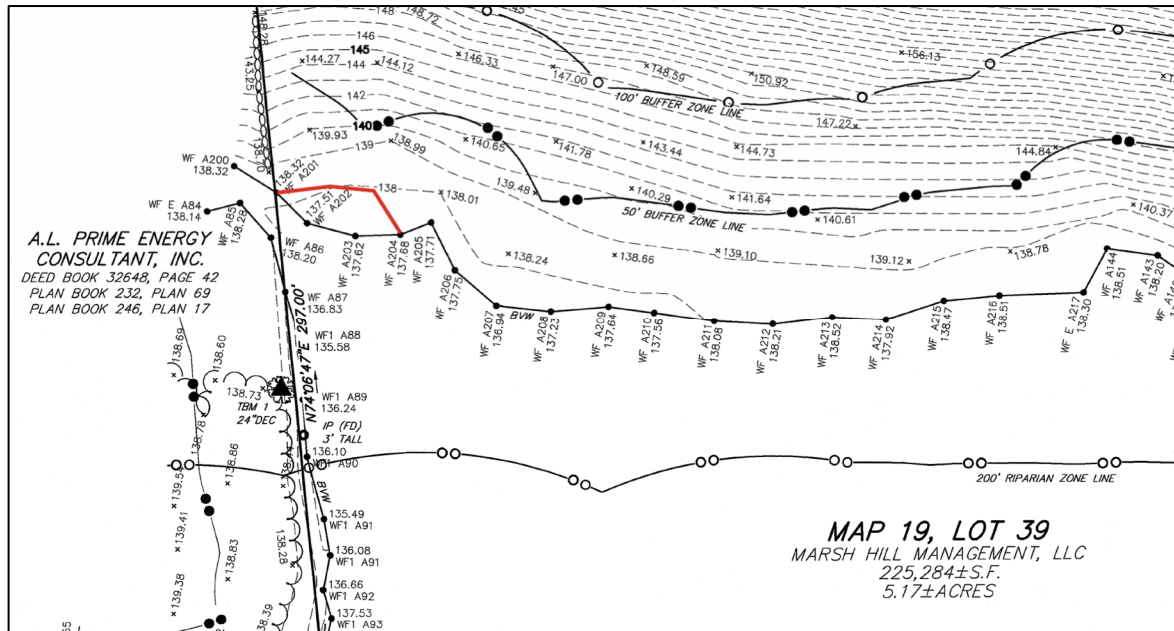
On June 3, 2025, Green International Affiliates, Inc. conducted an on-site review of the wetland flagging performed by Hancock Associates at 2041 Bridge Street in Dracut, Massachusetts. This peer review aims to assess the accuracy and compliance of the flagging with current regulatory standards and best practices.

The review included a complete site walk by a staff Wetland Scientist and a review of the flags which were placed by Hancock Associates. Soil samples were taken periodically to supplement the evidence provided by the observed vegetation and hydrologic evidence. Wetland flag Series "A144-A201 and A204-A217" accurately represents the boundaries of the delineated Bordering Vegetated Wetlands (BVWs). However, a section of Wetland flag Series "A" between flags A201 and A204 was found to have been flagged westward of the boundary as observed during the site visit based on the professional opinion of the staff Wetland Scientist and field indicators.

A forested area located eastward of wetland flags (WFs) #A202 and #A203 was identified as an upland area during Hancock Associates' assessment. However, the vegetation community in this area was dominated by a number of hydrophytic plant species, including sensitive fern (*Onoclea sensibilis*), cinnamon fern (*Osmundastrum cinnamomeum*), and royal fern (*Osmunda regalis*). This area also contained hydric soils (depleted matrix) and evidence of hydrology (soil saturation). The staff Wetland Scientist's recommendation is to omit the WF#s A202 and A203 and replace them with the alternative delineated boundary, which has been flagged in the field and labeled "GIA-WF-A202 and GIA-WF-A203". These new flags shift the BVW boundary approximately 15 feet east in the identified area. The Wetland Scientist's disagreement with the resource area delineation concludes at WF #A204, and they concur with the placement of the remainder of the "A" Series boundary. Moving these flags eastward will ensure that the aforementioned area is included as part of the BVW delineated by the Series "A".

Please feel free to reach out to James Thorne, P.E., Green International Affiliates, Inc. at [jthorne@greenintl.com](mailto:jthorne@greenintl.com) if you have any questions or need further clarification regarding this review.

**Figures**



**Figure 1:** Recommended alteration to the BVW Series "A" in red (replacement of flags A202 and A203).



**Figure 2:** Representative View of the vegetation present within the BVW area that was excluded from Hancock Associates' Series "A" wetland.



**Figure 3:** Representative View of the vegetation present within the BVW area that was excluded from Hancock Associates' Series "A" wetland.



**Figure 4:** Representative view of soils obtained from the area that was excluded from Hancock Associates' Series "A" wetland. Matrix color of 10YR 5/1 with prominent redox concentrations (Depleted matrix indicator).