



September 12, 2012

Wellesley Wetlands Protection Committee  
Attn: Diane Torres, Asst. NRC Director  
525 Washington Street  
Wellesley, Massachusetts 02482

Re: Wellesley Country Club  
New Maintenance Facilities Project; DEP File No. 324-647  
Wellesley, Massachusetts  
Response to Project Review Comments by Diane Torres

Dear Members of the Committee:

On behalf of the Wellesley Country Club, Coneco Engineers & Scientists Inc. (Coneco) is addressing the comments on the August 30<sup>th</sup> information package made by the Assistant NRC Director.

1. Is work also within the Buffer Zone of the BVW shown on the plans? If so, the Buffer Zone needs to be shown on the plans.

The buffer to BVW is wholly contained within the Riverfront Area. In fact, Riverfront Area extends further upslope than does the buffer. Since 310 CMR 10.58(4)a states "The work shall meet the performance standards for all other resource areas within the riverfront area..." and "When work in the riverfront area is also within the buffer zone to another resource area, the performance standards for the riverfront area shall contribute to the protection of the interests of M.G.L. c. 131, § 40 in lieu of any additional requirements that might otherwise be imposed on work in the buffer zone within the riverfront area" the convention has been to show the most restrictive resource (in this case Riverfront Area) on the project plans. This also helps to avoid the confusion caused by multiple over-lapping lines. If the Committee would prefer to have all over-lapping resources and buffers show we can certainly add these to the plans, but this will not result in a material change to the work, and protections, proposed.

2. Confirm erosion controls are on the plan.

Erosion controls have been added to the plans submitted on this date to the Committee.

3. Details of delineation.

The BVW and Bank delineations were completed in 2010 and reviewed in the field by the Committee's peer review consultant Beals & Thomas. The Committee accepted the resource area delineations as accurate earlier in the Hearing on the current NOI.

4. Alternatives analysis dated 9/9/10 was included with the original filing and is mentioned in this filing but an alternatives analysis for this project is needed.

This project is a part of the earlier one and the previously submitted alternatives analysis which was peer reviewed still applies. In short, the Club looked at three alternatives for utility service to the comfort station area. In each case water and electric service would still be required. The three alternatives are:

- 1) An on-site septic system--A Title 5 septic system was ruled out as not appropriate for the area because of the watershed protection issues (Beal & Thomas concurred).
- 2) A composting toilet system—Composting toilets are considered as Title 5 systems and are subject to on-site septic system and plumbing code regulations. They are typically used in lieu of tight tanks and are most appropriate where either a Title 5 septic system is not feasible or a community wastewater collection system is not available. The Club investigated composting toilets and queried other private clubs using these systems. Composting toilet systems have received mixed reviews because of operational, odor, and maintenance issues. Water for hand washing is not used in these systems and the use of “SaniGel” for hand washing is required. In other cases there has been a lack of acceptance of this method.

Composting toilet systems separate liquid and solid human waste, and both need to be removed and disposed of. Liquid is collected in a tight tank and this has to be pumped out and brought to a wastewater treatment system for disposal. Title 5 requires that composting toilet systems be designed to store compostable and composted solids for at least two years, either inside the composting chamber or in a separate compost container. Under Title 5 the composted material must either be buried on site or disposed of by a licensed septage hauler. Human waste compost cannot be beneficially re-used. Composting toilet systems rely on mechanical aeration equipment and electrical fans which operate continuously and use significant amounts of electricity as compared to an intermittent grinder pump. For these reasons the Club has decided to not consider a composting toilet system.

- 3) The proposed 1 ½-inch-diameter force main--The proposed force main will be installed in previously disturbed Riverfront Area and will not cause additional impact to the resource. The WPC’s peer reviewer (Beals & Thomas’ December 17, 2010 letter) concluded “The sewer force main utility from the Comfort Station is appropriate in Riverfront Area as the alternative would be an on-site septic system”.

The original proposal also called for stormwater treatment systems in the Riverfront Area (at the time a rain garden was proposed within the inner riparian zone). The revised proposal moves the stormwater treatment more towards the edge of the inner riparian zone (further from the river) and reduces the size of the system in this area. The Club has done this by adding additional stormwater treatment (infiltration) outside of the Riverfront Area to the east of the proposed comfort station. Therefore the current proposal further minimizes impact to the Riverfront Area.

5. A narrative is needed that describes the proposal for restoration and stormwater controls in the area off Brookside Road

As shown on Plan Sheet C4.3 the Club proposes to restore the area near Entrance Number 1 off Brookside Road in accordance with the request of the Wetland Protection Committee. The area has been cleared of any remaining stockpiled sand, gravel, and rock from the Academy Brook project and re-graded. The area is beginning to grow in nicely with a mixture of native forbs and the proposed restoration plan will mimic this natural growth.

There are three “zones” of restoration proposed for this area:

- Zone A (approximately 1,400 square feet) consists of a grassed swale designed to infiltrate stormwater flows prior to the flow reaching Brookside Road. This area will be sown with a wetland mixture of native sedges, grasses, and forbs and over sprayed with a compost mixture for water retention.
- Zone B (approximately 4,365 square feet) includes, and is on either side of, the access driveway. The driveway will remain a graveled path approximately 8-12 feet wide and the “shoulders” of this path will be graded and planted with an upland conservation/wildlife mixture of grasses and forbs.
- Zone C (approximately 14,024 square feet) consists of open areas currently vegetated with a variety of grasses and forbs. The proposal is to fine grade small portions of this zone, over seed the zone with a native wildflower mix, and spray the area with compost for water retention.

We have attached specification sheets from New England Wetland Plants, a supplier of native seed mixes, showing the make-up of the proposed seed mixes.

6. Does the access road remain as an access to the Country Club?

The Club has no intention of closing this entrance which has been in use for decades. It serves valuable functions both for the Club and emergency responders.

We appreciate the opportunity to respond to the questions posed by your administrator. We feel that all relevant questions have been adequately peer reviewed, vetted by the public, and discussed before the Committee. We respectfully request that the Committee rule on the application at its September 13<sup>th</sup> meeting as an additional continuance will serve no public or wetland protection purposes. If additional questions regarding issues under the Wetlands Protection Act and the Wetlands Protection Bylaw arise, we will make every effort to respond to them in a timely fashion. We look forward to discussing this project with you on September 13<sup>th</sup> as you requested.

If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "m. toohill".

Michael J. Toohill, PWS, CE  
Senior Environmental Scientist

Cc: Marty Ryan, Bill Sansone, Michael Grimes, and Paul DeYesso; Wellesley  
Country Club  
Arthur Kreiger, Rebekah Lacey; Anderson & Kreiger LLP  
Les Shea; Wilder & Shea  
DEP NERO

Attach: Seed Specification Sheets (3) from New England Wetland Plants, Inc.  
Revised Plan Sheets



# ***NEW ENGLAND WETLAND PLANTS, INC***

820 WEST STREET, AMHERST, MA 01002  
PHONE: 413.548.8000 FAX: 413.549.4000  
EMAIL: [INFO@NEWP.COM](mailto:INFO@NEWP.COM) WEB ADDRESS: WWW.NEWP.COM

## **New England Conservation/Wildlife Mix**

BOTANICAL NAME	COMMON NAME	IND.
ELYMUS VIRGINICUS	VIRGINIA WILD RYE	FACW-
SCHIZACHYRIUM SCOPARIUM	LITTLE BLUESTEM	FACU
ANDROPOGON GERARDII	BIG BLUESTEM	FAC
FESTUCA RUBRA	CREEPING RED FESCUE	FACU
PANICUM VIRGATUM	SWITCH GRASS	FAC
CHAMAECRISTA FASCICULATA	PARTRIDGE PEA	FACU
PANICUM CLANDESTINUM	DEER TONGUE	FAC+
SORGHASTRUM NUTANS	INDIAN GRASS	UPL
ASCLEPIAS SYRIACA	COMMON MILKWEED	FACU-
HELIOPSIS HELIANTHOIDES	OX EYE SUNFLOWER	UPL
EUPATORIUM PURPUREUM	PURPLE JOE PYE WEED	FAC
EUTHAMIA GRAMINIFOLIA	GRASS LEAVED GOLDENROD	FAC
VERBENA HASTATA	BLUE VERVAIN	FACW
ZIZIA AUREA	GOLDEN ALEXANDERS	FAC
ASTER UMBELLATUS	FLAT TOPPED/UMBRELLA ASTER	FACW
SOLIDAGO JUNCEA	EARLY GOLDENROD	NI

PRICE PER LB. \$30.00

MIN. QUANTITY: 2 LBS.

**TOTAL** \$60.00

*APPLY: 25 LBS/ACRE*

*MINIMUM QUANTITY: 2 LBS*

The New England Conservation/Wildlife Mix provides a permanent cover of grasses, wildflowers and legumes to provide both good erosion control and wildlife habitat value. This mix is designed to be a no maintenance seeding, and it is appropriate to cut and fill slopes, detention basin slopes, and disturbed areas adjacent to commercial and residential projects. Always apply on clean bare soil.

The mix may be applied by hydro-seeding, by mechanical spreader, or on small sites it can be spread by hand. Lightly rake, or roll to ensure proper seed to soil contact. Best results are obtained with a Spring seeding. Late Spring through early Summer seeding will benefit with a light mulching of weed-free straw to conserve moisture. If conditions are drier than usual, watering will be required. Late Fall and Winter dormant seeding require an increase in the seeding rate. Fertilization is not required unless the soils are particularly infertile. Preparation of a clean weed free soil surface is necessary for optimal results.

New England Wetland Plants, Inc. may modify seed mixes at any time depending upon seed availability. The design criteria and ecological function of the mix will remain unchanged.

Price is \$/bulk pound. FOB warehouse, plus S&H and applicable taxes.



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PHONE: 413.548.8000 FAX: 413.549.4000  
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## **New England Wildflower Mix**

BOTANICAL NAME	COMMON NAME	IND.
SCHIZACHYRIUM SCOPARIUM	LITTLE BLUESTEM, NY ECOTYPES	FACU
FESTUCA RUBRA	CREEPING RED FESCUE	FACU
SORGHASTRUM NUTANS	INDIAN GRASS	UPL
ELYMUS CANADENSIS	CANADA WILD RYE	FACU+
ELYMUS VIRGINICUS	VIRGINIA WILD RYE	FACW-
CHAMAECRISTA FASCICULATA	PARTRIDGE PEA	FACU
LUPINUS PERENNIS	WILD BLUE LUPINE	NI
ASCLEPIAS SYRIACA	COMMON MILKWEED	FACU-
ZIZIA AUREA	GOLDEN ALEXANDERS	FAC
RUDBECKIA HIRTA	BLACK EYED SUSAN	FACU-
MONARDA FISTULOSA	WILD BERGAMOT	UPL
ASTER LATERIFLORUS	CALICO ASTER	FACW
ASTER NOVAE-ANGLIAE	NEW ENGLAND ASTER	FACW-
OENOTHERA BIENNIS	EVENING PRIMROSE	FACU-
PENSTEMON DIGITALIS	BEARD TONGUE	FAC
VERBENA HASTATA	BLUE VERVAIN	FACW
VERNONIA NOVEBORACENSIS	NEW YORK IRONWEED	FACW+
ASTER LAEVIS	SMOOTH BLUE ASTER	UPL
EUTHAMIA GRAMINIFOLIA	GRASS LEAVED GOLDENROD	FAC
SOLIDAGO JUNCEA	EARLY GOLDENROD	NI

PRICE PER LB.     \$66.00  
 REQ. QUANTITY:   1 LBS.  
**TOTAL**             \$66.00

APPLY: 23 LBS/ACRE  
 MINIMUM QUANTITY: 1 LBS

The New England Wildflower Mix includes a selection of native wildflowers and grasses that will mature into a grass and forb native meadow. It is an appropriate seed mix for roadsides, commercial landscaping, parks, golf courses, industrial sites and ecologically sensitive areas.. Always apply on clean bare soil. The mix may be applied by mechanical spreader, or on small sites it can be spread by hand.

Lightly rake, or roll to ensure proper seed to soil contact. Best results are obtained with a Spring or late Fall dormant seeding. Late Spring and Summer seeding will benefit with a light mulching of weed-free straw to conserve moisture. If conditions are drier than usual, watering may be required. Late Fall and Winter dormant seeding require an increase in the seeding rate. Fertilization is not required unless the soils are particularly infertile. Preparation of a clean weed free soil surface is necessary for optimal results.

New England Wetland Plants, Inc. may modify seed mixes at any time depending upon seed availability. The design criteria and ecological function of the mix will remain unchanged.

Price is \$/bulk pound. FOB warehouse, plus S&H and applicable taxes



# NEW ENGLAND WETLAND PLANTS, INC

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PHONE: 413.548.8000 FAX: 413.549.4000  
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## New England Wetmix (Wetland Seed Mix)

BOTANICAL NAME	COMMON NAME	IND.
CAREX VULPINOIDEA	FOX SEDGE	OBL
CAREX LURIDA	LURID SEDGE	OBL
CAREX SCOPARIA	BLUNT BROOM SEDGE	FACW
VERBENA HASTATA	BLUE VERVAIN	FACW
SCIRPUS ATROVIRENS	GREEN BULRUSH	OBL
CAREX LUPULINA	HOP SEDGE	OBL
BIDENS CERNUA	NODDING BUR MARIGOLD	OBL
CAREX COMOSA	BRISTLY/COSMOS SEDGE	OBL
CAREX CRINITA	FRINGED SEDGE	OBL
JUNCUS EFFUSUS	SOFT RUSH	FACW+
SCIRPUS CYPERINUS	WOOL GRASS	FACW
GLYCERIA GRANDIS	AMERICAN MANNA GRASS	OBL
EUPATORIUM MACULATUM	SPOTTED JOE PYE WEED	FACW
EUPATORIUM PERFOLIATUM	BONESET	FACW
ALISMA SUBCORDATUM	MUD PLANTAIN	OBL
ASTER PUNICEUS	PURPLE STEMMED ASTER	OBL
GLYCERIA CANADENSIS	RATTLESNAKE GRASS	OBL
SCIRPUS VALIDUS	SOFT STEM BULRUSH	OBL
ASCLEPIAS INCARNATA	SWAMP MILKWEED	OBL
MIMULUS RINGENS	SQUARE STEMMED MONKEY FLOWER	OBL

PRICE PER LB. \$125.00

REQ. QUANTITY: 1 LBS.

**TOTAL** \$125.00

APPLY: 18 LBS/ACRE

MINIMUM QUANTITY: 1 LBS

The New England Wetmix (wetland seed mix) contains a wide variety of native seeds which are suitable for most wetland restoration sites that are not permanently inundated. All species are best suited to moist disturbed ground as found in most wet meadows, scrub shrub, or forested wetland restoration areas. This mix is well suited for detention basin borders, and the bottom of detention basins not generally under standing water. The seeds will not germinate under inundated conditions. During the first year of growth, several

species will produce seeds, while other species will produce seeds after the second growing season. Not all species will grow in all wetland situations. This mix is composed of the wetland species most likely to grow in created/restored wetlands and should produce more than 75% ground cover in two full growing seasons. Always apply on clean bare soil. The mix may be applied by hydro-seeding, by mechanical spreader, or on small sites it can be spread by hand. Lightly rake, or roll to ensure proper seed to soil contact. Best results are obtained with a spring seeding. Late spring and early summer seeding will benefit with a light mulching of clean weed-free straw to conserve moisture. If conditions are drier than usual, watering may be required. Late fall and winter dormant seeding require an increase in the seeding rate. Fertilization is not recommended. Preparation of a clean weed free seed bed is necessary for optimal results.

New England Wetland Plants, Inc. may modify seed mixes at any time depending upon seed availability.  
The design criteria and ecological function of the mix will remain unchanged.

Price is \$/bulk pound, FOB warehouse, plus S&H and applicable taxes.