



June 17, 2019

Town of Ashland Conservation Commission  
Attn: Maeghan Dos Anjos  
101 Main Street  
Ashland, Massachusetts 01721

Re: Project Review – Notice of Intent & Stormwater Management Permit  
Eversource Energy - Hopkinton to Ashland Transfer Line Replacement  
MassDEP File #095-0926  
Cedar Street to the Hopkinton Town Line  
Ashland, Massachusetts

Dear Ms. Dos Anjos,

Lucas Environmental, LLC (LE) has completed a review of the materials submitted in support of the Notice of Intent (NOI) and Stormwater Management Permit (SMP) for the Hopkinton to Ashland Transfer Line Replacement Project located within the Eversource Energy utility right-of-way from Cedar Street to the Hopkinton town line in Ashland, Massachusetts.

The review of the NOI has been completed in compliance with the Massachusetts Wetlands Protection Act and implementing regulations (WPA; 310 CMR 10.00 et seq.), the Ashland Wetlands Protection Bylaw (Chapter 280), the Ashland Wetlands Protection Regulations (Chapter 348), the Ashland Stormwater Management Bylaw (Chapter 247), and the Ashland Stormwater Management Regulations (Chapter 343).

LE presumes that the Applicant will continue to respond to previous comments made on the application by Maeghan Dos Anjos, Ashland Conservation Agent. Such comments may or may not be included and/or enlarged upon in this memorandum.

## 1.0 Documents Reviewed

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- Notice of Intent Application and supporting materials, prepared by TRC Environmental Corporation, dated December 18, 2018.
- Project plans entitled: “Eversource Energy Hopkinton-Ashland Transfer Line Replacement Project Towns of Hopkinton & Ashland Middlesex County, Massachusetts” (42 sheets), prepared by Tri-Mont Engineering Company, dated March 18, 2019.
- Stormwater Management Permit Application (Supplement) Hopkinton to Ashland Transfer Line Replacement Project Ashland, Massachusetts, prepared by TRC Environmental Corporation, dated March 2019.
- Letter to Matthew Waldrip, Eversource from Maeghan Dos Anjos Subject: 95-926 Eversource Transfer Line Response to March 20 Revisions, dated March 25, 2019.

- Memorandum to Matthew Waldrip, Katelyn Wheeler, Richard Paquette, Sean Berthiaume from Maeghan Dos Anjos, Conservation Agent, dated January 8, 2019.
- Ashland Conservation Commission Minutes of January 28, 2019, February 25, 2019, March 11, 2019, March 25, 2019.
- Document entitled: “Attachment F – Application to Support Petition Before the Energy Facilities Siting Board (Provided on CD)”, prepared by TRC Environmental Corporation, dated June 2018.
- Document entitled: “Eversource Energy – Hopkinton to Ashland Transfer Line Replacement Project (DEP File No. 95-926) Response to Comments on Notice of Intent and Stormwater Management Permit Application,” prepared by TRC Environmental Corporation, dated March 19, 2019.

## 2.0 Project Summary

The proposed project consists of the replacement of approximately 3.71 miles of existing 6-inch diameter steel natural gas pipe with 12-inch diameter steel natural gas pipe within the towns of Hopkinton and Ashland. Approximately 2.6 miles of the project is within the town of Ashland. The project will temporarily impact several wetland resource areas that occur within the utility easement. The application states that approximately 42,587 square feet of Bordering Vegetated Wetlands (BVW), 309 linear feet of Bank, 1,231 square feet of Land Under Water Bodies and Waterways (LUWW), 47,515 square feet of Bordering Land Subject to Flooding, and 49,792 square feet of Riverfront Area will be temporarily disturbed. Work will also occur within the 100-Foot Buffer Zone to BVW.

For the purposes of this review and ease of impact area identification, LE has assigned each impact area with a unique number that is used throughout this document. Numbering is established from west to east, with Impact Area #1 occurring immediately east of Pennock Road. The following table summarizes all wetland impact areas:

<b>Impact Area #</b>	<b>Project Stationing (approximate)</b>	<b>Nearest Landmark</b>
1	64+00 to 66+00	East of Pennock Road
2A	80+50	East of Winesap Way
2	81+00 to 82+00	East of Impact Area 2A
3	97+00 to 98+00	West of West Union Street
4	101+00 to 109+00	East of West Union Street
5	128+00 to 133+00	East of Metropolitan Avenue
6	135+00 to 139+50	Includes Cold Spring Brook
7	180+50 to 181+00	North of Brimstone Way cul-de-sac
8	188+00 to 188+50	West of Impact Area 9
9	189+00	West of Carriage House Path

### **3.0 Comments and Requests for Additional Information**

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The following are our comments and/or requests for additional information. Additional materials submitted to the Ashland Conservation Commission (ACC) during the course of the public hearing will be reviewed by LE and commented on, as requested by the ACC.

1. LE has been advised by the ACC that the original legal document associated with the establishment of the easement includes language that may influence the design of the project (i.e., allowing only one pipe within the easement versus two). LE recommends this issue be resolved prior to further review as it may have a significant impact on the design of the project.
2. Site visits were conducted by LE with the Applicant's representative on May 23 and June 12, 2019 to inspect the boundaries of wetland resource areas. The following observations were made:
  - a. A previously undelineated wetland resource area was identified at Project Station 80+50. The Applicant subsequently delineated this area, based on the prevalence of hydrophytic vegetation and evidence of hydrology. LE has inspected and agrees with the delineation.
  - b. A minor modification was made to wetland flagging at Project Station 81+30. A flag revision was made based on the presence of dominant wetland vegetation and evidence of hydrology.
  - c. A minor modification was made to wetland flagging at Project Station 109+00. Flagging was revised based on the presence of dominant wetland vegetation and evidence of hydrology.
  - d. A minor modification was made to wetland flagging at Project Station 127+80. Flagging was revised based on the presence of dominant wetland vegetation and evidence of hydrology.
  - e. A modification was made to wetland flagging at Project Station 133+70. Flagging was revised based on the presence of dominant wetland vegetation and evidence of hydrology.
  - f. Modifications were made to wetland flagging in the vicinity of Project Stations 138+00 to 140+00. Flagging was revised based on the presence of a hillside seep and dominant wetland vegetation and evidence of hydrology.
  - g. A minor modification was made to wetland flagging at Project Station 188+50. Flagging was revised based on the presence of dominant wetland vegetation and evidence of hydrology.
  - h. A previously undelineated wetland resource area was identified at Project Station 189+60. The Applicant subsequently delineated this area in the presence of LE, based on the presence of dominant wetland vegetation and evidence of hydrology.
  - i. Within Impact Area 7 (Project Station 181+00), the existing 6-inch gas line is exposed within the channel. LE recommends the Applicant describe if this pipe will be removed as part of the project and how the proposed 12-inch pipe will be installed to prevent further erosion and downcutting of the stream channel that could result in the exposure of the new pipe.

- j. A constructed stormwater basin exists to the south of Project Station 64+00. LE observed a headwall at the northern end of the basin. Due to its proximity to the project area, LE recommends the Applicant depict existing drainage pipes associated with this structure and any BMPs proposed to protect it.
  - k. LE recommends that the Applicant show the 100-Foot Buffer Zones from any known existing wetland resources outside of the easements. This is particularly applicable in the vicinity of Project Stations 181+00 to 185+00.
  - l. LE recommends the Applicant submit StreamStats analyses for all intermittent streams within the project area, in accordance with 310 CMR 10.58(2)(a)1.
  - m. LE presumes that the appropriately georeferenced CAD files of the revised wetland boundaries will be submitted to the ACC for their use, as required.
3. Based upon the modification to the wetland boundaries, the Applicant will need to recalculate all impact numbers and submit revised information as part of the application. Updated impacts quantities for all types of resource areas (including the local 25-Foot No Disturb Zone) should be provided. Due to the change in the wetland impacts, the Applicant will need to revise their Section 404 General Permit and Section 401 Water Quality Certificate applications (or request permit modifications, if permits have been issued).
4. The Applicant has submitted the Notice of Intent application as a Limited Project, as allowed per 310 CMR 10.53(3)(d), which allows “*the construction, reconstruction, operation and maintenance of underground and overhead public utilities, such as electrical distribution or transmission lines, or communication, sewer, water and natural gas lines.*” As it pertains to the review of Limited Projects, the language in 310 CMR 10.53(3) states: “*In determining whether to exercise its discretion to approve the limited projects listed in 310 CMR 10.53(3), the Issuing Authority shall consider the following factors: the magnitude of the alteration and the significance of the project site to the interests identified in M.G.L. c. 131, § 40, the availability of reasonable alternatives to the proposed activity, the extent to which adverse impacts are minimized, and the extent to which mitigation measures, including replication or restoration, are provided to contribute to the protection of the interests identified in M.G.L. c. 131, § 40.*” The Applicant has provided a performance standard analysis for each of the resource area types proposed to be altered by the project. However, the Applicant has not provided a detailed analysis of how the project will protect the individual interests identified in M.G.L. C.131, § 40 and the values identified in the Ashland Wetlands Protection Bylaw (Chapter 280). LE recommends the Applicant provide such an analysis and consider including qualitative and quantitative findings of the analysis in the project alternatives scoring document.
5. The Applicant states: “*Emergent wetlands impacted during construction will be restored completely to the function and values observed during the field delineation through natural revegetation processes and supplemental seeding. These areas will quickly recover following construction. PSS wetlands impacted during construction will also be restored through natural revegetation processes. Although the herbaceous understory within these areas should quickly recover following construction, there may be a temporal lag before the sub-canopy reaches maturity.*” LE recommends the Applicant provide the basis for the statement of anticipated “quick” recovery of impacted wetland resource areas. LE further recommends that the ACC discuss if mitigation is warranted for the temporal loss of habitat that is described by the Applicant and/or as allowed in the issuance of a Waiver under the Bylaw regulations.

6. The Applicant states: “*The area of PFO wetland habitat affected by Project construction in Ashland State Park will be restored to a PEM and PSS habitat in coordination with DCR. For pipeline safety, tree species will not be allowed to regrow within the easement following construction of the replacement pipeline. Compensatory mitigation for vegetation maintenance of this PFO wetland (to a PSS and/or PEM wetland) is not proposed because the wetland is within an existing utility easement that was previously cleared during the original construction of the 6-inch diameter pipeline.*” LE recommends the Applicant describe why tree species cannot be allowed to regrow if they currently occur unmanaged, within the easement. LE recommends the ACC discuss if mitigation is required for the alteration in cover type that is described by the Applicant and is allowed for as part of the issuance of a Waiver under the Bylaw regulations.
7. Pertaining to stream channel restoration, the Applicant states: “*Topographical contours and elevations are obtained for the entire Project area prior to the start of construction. This data is shown on the Project drawing and is used to assist Eversource’s construction contractor in the re-establishment of pre-construction grades and bank configuration after the installation of the pipe.*” The project plans submitted with the application do not appear to include the level of detail described above. LE recommends the ACC discuss if such detailed information should be submitted for review prior to the closure of the public hearing process. In LE’s experience, stream channel restoration has the greatest potential for failure post construction and pre-construction assessment and post-construction restoration activities should be overseen by qualified personnel with training and experience in fluvial geomorphology.
8. The Applicant states that the project will result in 47,515 square feet of impact to BLSF. Based on a review the plan, LE believes this calculation to be incorrect. Per the WPA definition: “*Bordering Land Subject to Flooding is an area with low, flat topography adjacent to and inundated by flood waters rising from creeks, rivers, streams, ponds or lakes. It extends from the banks of these waterways and water bodies; where a bordering vegetated wetland occurs, it extends from said wetland.*” It appears the Applicant may not have excluded those portions of the 100-year floodplain that area within the delineated boundary of BVW. This conclusion is based on a review of the project plans as the following statement, included in the Wildlife Habitat Evaluation Report: “*The BLSF associated with the stream generally occupies the same area as the BVW within the easement crossing.*” Only that portion of the 100-year floodplain that extends outside of the BVW should be designated at BLSF. LE recommends confirmation of the BLSF impact calculation.
9. LE recommends the Applicant provide a detailed assessment of invasive species infestations within the wetland resource areas and Buffer Zones. LE noted the presence of *Phragmites australis* within Impact Areas 4 and 8. Due to its ability to rapidly spread within disturbed soils, LE recommends the Applicant provide specific methodologies for control and post-construction monitoring and treatment in areas that are at higher risk, based upon the infestation assessment.
10. As acknowledged by the Applicant, a potential vernal pool (PVP) occurs proximal to the project area (to the northwest) in the vicinity of Pennock Road. Additionally, an area identified by LE as a PVP occurs proximal to the project area (to the north) near Impact Area 7 (Project Station ±182+00). LE recommends both PVP locations be added to the plans. According to the Bylaw: “*Within a Vernal Pool and its Buffer Zone, no activity or alteration is permitted unless it is shown to the Commission’s satisfaction that a proposed activity will have no detrimental effect on the habitat value of the Vernal Pool. Activities and alterations include, but are not limited to removal or alteration of vegetation; removal or alteration of natural ground cover including leaves, logs, and other vegetative litter;*

*grading; landscaping; filling; construction or placement of structures or pavement of any sort. The Commission may allow limited alterations to areas that, in their existing condition and use, do not serve a significant habitat function.”* LE recommends the Applicant demonstrate compliance with this Bylaw standard, including any proposed mitigation.

11. In their response letter, dated March 19, 2019, the Applicant provides additional detail on dewatering methods. Based upon the length of the wetland crossings and hydrologic conditions in Impacts Areas 4, 5, and 6, the proposed methods would appear to be infeasible. LE recommends the Applicant provide site-specific dewatering methodologies for each Impact Area that can be included in permitting and construction documents.
12. The Applicant states: *“Any excess soil will be trucked offsite to a pre-approved disposal facility or spread in an upland location along the cleared easement.”* LE recommends the Applicant provide greater detail on the methodology for spreading soil excess soil within upland areas, including such topics as maximum deposition depths, temporary and permanent stabilization of deposited soils, the potential for changes to drainage characteristics, and consideration of existing topography for deposition locations. LE recommends specific documentation of any proposed deposition within the 100-Foot Buffer Zone and/or BLSF.
13. LE recommends the Applicant provide greater detail on proposed work within BLSF. Soil stockpiling and storage of equipment/materials within BLSF has the potential to cause temporary loss of floodplain. LE recommends the Applicant provide information on anticipated duration of work within BLSF and proposed constraints on types and duration of impacts.
14. The Applicant states that *“Brush and fallen trees within the easement will be cut and chipped in place prior to installation of the erosion and sediment controls.”* LE recommends greater detail be provided on this methodology. LE does not recommend chipped material be placed within regulated wetland resources. Furthermore, larger woody debris within the wetland resources has the potential to provide important wildlife habitat and should be temporarily or permanently relocated within the wetland, rather than permanently removed.
15. The Applicant states: *“Although most of the Project area is gently sloped, there are two steep slope areas crossed by the Preferred Route. One is located between Pennock Road to Winesap Way (Magunco Hill) and the other is at Chestnut Street (east of Ashland State Park). Eversource’s objective is to minimize the potential for erosion and sedimentation impact during pipeline construction”* with several proposed measures. LE recommends that these areas be specifically identified on the planset with notations for additional stabilization measures.
16. LE recommends the Applicant describe how vegetation will be cut prior to the installation of the timber matting, where required.
17. LE recommends the Applicant disclose proposed equipment refueling locations on the project planset.
18. There is evidence that beavers inhabit several of the wetland resource areas within the project area. LE recommends the Applicant describe contingencies for work within beaver-induced flooded conditions within resource areas at the time of construction.
19. In the construction description, the project narrative states: *“To expedite backfilling and minimize hauling by truck, excavated soils will be stockpiled immediately adjacent to the open trench.”* Within wetland resources that contain histosols and histic epipedon soils (or other soil types that are extremely saturated), stockpiling directly on the matting, adjacent to the open trench will not be

feasible. LE recommends the Applicant provide an alternative stockpile methodology for such areas and the anticipated methodology for different soil types should be identified on the planset.

20. LE recommends the Applicant provide greater detail on the feasibility of constructing the project as proposed within the 20-Foot and 30-Foot wide easements. LE recommends accurately scaled figures be provided that depict all components that are anticipated to be necessary for construction within resource areas. If the project is not constructible within the existing easements, temporary construction easements may need to be obtained by the Applicant. Such additional easements may result in increased wetland impact totals. LE recommends the need for temporary easements be reviewed by the Applicant and discussed with the ACC prior to closure of the public hearing process.
21. LE has the following comments on the evaluation of alternative routes, included within the application:
  - a. The alternatives analysis includes a scoring criterion called “Wetland Resource Areas and Buffer Zones.” The scoring for wetland impacts is assessed “*by calculating the total estimated area of wetland resources and buffer zones crossed by each Candidate Route.*” The scoring does not appear to include any consideration of the individual functions and values (as defined in the WPA and/or Bylaw) that may be provided by one wetland system over another. LE recommends the ACC discuss if there is a desire for the Applicant to score wetland resource area and Buffer Zone impacts qualitatively, in addition to quantitatively for each alternative analyzed.
  - b. The analysis methodology includes “Environmental and Constructability Weighting” to assign more value to certain criteria and less to others. The method assigns a weight of one, two, or three to each criterion evaluated. Wetland Resource Areas and Buffer Zone Crossings are assigned a weight of two. LE recommends the Applicant describe the basis of the weights assigned to each criterion and if the analysis will change significantly if the Wetland Resource Areas and Buffer Zone Crossings were assigned a weight of three.
  - c. LE acknowledges that the preferred Transfer Line Easement Route received an unweighted score of 5.18 and a weighted score of 10.88, as analyzed by the Applicant. These scores result in the top ranking of the alternative and resulting designation as preferred alternative.
  - d. LE recommends the Applicant describe how values for Wetland Resource Areas and Buffer Zone Crossings were determined for each of the other alternatives considered.
  - e. LE notes that not all wetland impact areas were properly documented and accounted for in the original analysis. LE recommends the Applicant review the scoring analysis, based on the current wetland and Buffer Zone impact totals.
  - f. The alternatives analysis includes a scoring criterion called “Residential Units” or “Residential Structures.” This receptor includes residences that “*could be affected during construction by Project activities including noise and dust as well as temporary traffic disruptions.*” LE requests the Applicant describe if all impacts to residences were treated equally or if impacts were weighted based on type of alteration. For example, was alteration from construction in the roadway in the front of the dwelling treated equally to alteration of direct construction within the rear of the property, which may be much more disruptive?

- g. LE recommends the Applicant describe what work would be necessary within the current easement to abandon the existing pipe if a different alternative were to be selected.
22. At Impact Area 4 on the Planset, the Applicant states that the existing “*old wooden bridge to be temporarily relocated during construction.*” LE is of the opinion that the bridge is not in a condition where it can be temporarily relocated. If it is to be moved, it should be discarded. LE recommends the applicant describe if the bridge is to be replaced, and if so, provide specifications on the replacement structure.
23. The Eversource BMP Manual does not specify the type of seed mix that will be used to revegetate altered wetland and Buffer Zone areas. LE recommends the Applicant provide a list of seed mixes that may be used for restoration to allow review and approval by the ACC.
24. At the time of issuance of this memorandum, MassDEP has issued a file number (#095-0926); however, no comments appear on the MassDEP website pertaining to the application.
25. LE will provide commentary on the Applicant’s Wildlife Habitat Evaluation (WHE) Report in concert with submission of the stand-alone WHE being prepared by LE.

#### **4.0 Professional Engineer Review**

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The following comments are submitted, as prepared by Mr. Scott Salvucci, P.E. of Woodward and Curran.

Woodard & Curran has reviewed the submitted documentation for the Hopkinton to Ashland Transfer Line Replacement Project for compliance with the applicable aspects of the Town of Ashland’s Stormwater Management By-Law and the Massachusetts Stormwater Management Standards. The following is a summary of the documentation reviewed by Woodard & Curran and our findings and recommendations.

##### **Documents Reviewed**

Woodard & Curran obtained and reviewed the following documentation provided by Lucas Environmental, LLC relative to this matter:

- Stormwater Management Permit Application Filed under the Town of Ashland Stormwater Management Bylaw entitled: “Eversource Energy – Hopkinton to Ashland Transfer Line Replacement Project”, dated January 4, 2019, prepared by TRC Companies, Inc.;
- Plan set entitled: “Eversource Energy, Hopkinton-Ashland Transfer Line Replacement Project”, dated December 12, 2018, prepared by Tri-Mont Engineering Company;
- Response to Comments Letter entitled: “Eversource Energy – Hopkinton to Ashland Transfer Line Replacement Project (DEP File No. 95-926), Response to Comments on Notice of Intent and Stormwater Management Permit Application”, dated March 19, 2019, prepared by TRC Companies, Inc.; and

- Response to Revisions Letter entitled: “Subject: 95-926 Eversource Transfer Line, Response to March 20 Revisions”, dated March 25, 2019, prepared by the Town of Ashland Massachusetts Office of Conservation Commission.

### **Findings and Recommendations**

Based on our review of the above referenced documentation, Woodard & Curran offers the following findings and recommendations relative to the documentation reviewed for compliance with the applicable aspects of the Town of Ashland’s Stormwater Management By-Law and the Massachusetts Stormwater Management Standards. In addition to reviewing the project for compliance with the aforementioned regulations, Woodard & Curran reviewed the design for general good engineering practices.

#### **Stormwater Management Permit Application:**

1. The Applicant states no new impervious area will be created as part of this project; therefore, stormwater management analysis and design are not required.

**Recommendation: The Applicant should provide the Conservation Commission with a copy of the Stormwater Pollution Prevention Plan (SWPPP) prior to commencing work.**

2. The Applicant has provided a phasing plan for each of the proposed 5-years of work.

**Recommendation: A pre-construction meeting should be held at the beginning of each construction season to set and inspect erosion control devices.**

3. Section 2.4 Soil Stockpiling does not indicate that erosion controls will surround soil stockpiles. The Applicant states soil will be stockpiled immediately adjacent to the trench.

**Recommendation: The Applicant should revise Section 2.4 to describe erosion control measures to be used for soil stockpiles that will remain overnight / extended periods of time. The Applicant accounts for the use of steel plates at the end of the day if an excavation remains open; therefore, in certain instances stockpiled soil may remain overnight / extended periods of time.**

**The Applicant should state the proper distance a stockpile shall be located from an open trench, per OSHA requirements.**

4. Section 2.7 Backfill and Compaction states excess soil may be spread in an upland location along the cleared easement.

**Recommendation: The Applicant should provide soil stabilization measures and permanent seeding for the potential excess soil if it will be spread in an upland.**

5. Section 2.10 Pipe Retirement states the existing 6-inch diameter pipe will be abandoned in place, with the ends cut and grouted.

**Recommendation: The Applicant should provide a detail for properly sealing the pipe ends, and**

**plan to minimize the number of pipe end cuts that will require sealing. The Applicant should provide specifications of the grout material to be used and manufacturer installation requirements. The Applicant should provide information regarding the longevity of the grout material, to ensure the pipe seal will not deteriorate over time.**

6. The Plans identify multiple privately-owned sheds to be temporarily relocated during construction; however, Section 4.0 Construction in Residential Areas does not describe measures to be implemented relative to relocated sheds.

**Recommendation: The Applicant should revise Section 4.0 to describe construction activities relative to temporarily relocating privately-owned sheds.**

7. The Applicant has provided Trenchless Construction Method Evaluation as part of the Notice of Intent submission. Two methods are evaluated, the Jack and Bore method and the Horizontal Directional Drilling (HDD) Method.

**Recommendation: The Applicant identifies the primary reason for open trench construction as the preferred method based on lack of available workspace. Although this may be the primary reason, for HDD the drilling fluids and spoils from this operation are also a major deterrent when working in the vicinity of resource areas.**

**Permit Plans:**

8. It appears as though the Plans do not show and/or label public and private wells, excess soil stockpiling locations, or existing stormwater management systems and best management practices (BMPs) as required by the Town of Ashland's Stormwater Management By-Law.

**Recommendation: The Applicant should show and label all public and private wells, soil stockpiling locations, and existing stormwater management systems and BMPs on the Plans.**

9. The Applicant does not provide an inlet protection detail for catch basins within the construction area on the permitting plans.

**Recommendation: The Applicant should provide an inlet protection detail in accordance with the Eversource Best Management Practices Management Manual (Manual). Although the Applicant refers to the Manual, it may be beneficial during construction to have this detail available as part of the construction plan set miscellaneous details.**

10. The Applicant provides a typical hay bales usage detail on the miscellaneous details sheet.

**Recommendation: The Applicant should update this detail to call for straw rather than hay, as hay has the potential to contain invasive seeds. The Applicant should revise any references to hay within the Stormwater Management Permit Application and Permitting Plans.**

11. The Applicant provides a trench detail for pavement replaced within roadway trenches; however, the Applicant does not provide a section detail for the concrete pad that is proposed to be replaced on Sheet 32.



**Recommendation: The Applicant should provide a section detail for the concrete pad that is proposed to be replaced.**

12. Detail 1 on Sheet D03 should show a temporary culvert if needed along the existing ditch line to provide adequate drainage, as shown in the Eversource Best Management Practices Management Manual.

**Recommendation: The Applicant should revise Detail 1 on Sheet D03 to include a temporary culvert in accordance with the Eversource Best Management Practices Management Manual.**

13. Details 1-4 on Sheet D04 do not show erosion controls surrounding the spoil areas to demonstrate adequate erosion control measures surrounding stockpiled areas. Additionally, the Applicant does not provide a soil stockpile management detail in accordance with the Massachusetts Erosion and Sediment Control Guidelines for Urban and Suburban Areas and the Eversource Best Management Practices Manual.

**Recommendation: The Applicant should revise Details 1-4 on Sheet D04 to show erosion controls surrounding spoil areas and provide a soil stockpile management detail.**

**General Comments:**

14. At this time with the documents available, the Applicant has not yet revised the Stormwater Management Permit Application and Permitting Plans per the Town of Ashland Massachusetts Office of Conservation Commission Response to March 20 Revisions letter.

**Recommendation: The Applicant should coordinate revisions to the Stormwater Management Permit Application and Permitting Plans per the outstanding and additional Conservation Commission comments.**

If you have any questions, please do not hesitate to contact me at 617.405.4860 or [mdv@lucasenvironmental.net](mailto:mdv@lucasenvironmental.net). Thank you for your consideration in this matter.

Sincerely,  
LUCAS ENVIRONMENTAL, LLC

A handwritten signature in black ink that reads 'Matthew Varrell'. The signature is written in a cursive, flowing style.

Matthew Varrell, Manager, PWS  
Environmental Consultant/Wetlands Scientist