

Eversource Energy Hopkinton to Ashland Transfer Line Project
Response to November 20, 2019 Town of Ashland Conservation Agent Memorandum
File No. 95-926

Agent's Comments

Comment 18. Equipment mat anchoring

To address concerns with potential flooding in wetlands A17-7 and A17-8, equipment mats will be anchored by lashing them together with a heavy-duty cable or rope. The lashed mats will be secured to a large tree(s) along the easement edge for extra stability.

Comment 20.5.D. Temporary Workspace

During the evaluation of constructability, Eversource evaluated obtaining temporary construction easements adjacent to the existing permanent easement to expand the workspace width but decided against this because of the additional environmental and property owner impacts such as land clearing, and complex logistics involved with securing multiple new easements.

Comment 20.5.E. and Comment 40. Silt fence installation

The contractor will install the super silt fence into the ground adjacent to the equipment mats along the edges of the easement. The fence will be tall enough to extend above the mats. This will act as a barrier to soils temporarily stored on the mats during trench excavation. Depending on site conditions at the time of construction, the contractor may also fasten the super silt fence directly to the mat edges in addition to staking it in the ground to form a tighter seal with the mats. This additional measure will be implemented if it's determined to provide enhanced soil control at the time of construction.

Silt fence will be installed using the same method for both saturated and non-saturated wetlands. Silt fence will be installed in wetlands but not across streams. A narrow trench will be dug so the bottom of the fence lies below the ground surface thereby providing an effective seal against soil migration. Wooden stakes will be driven using hand tools in the wetlands west of West Union Street and east of Prospect Street. The contractor will use super silt fence in the two large wetlands (A17-7 and A17-8) located east of West Union Street and west of Chestnut Street (including Ashland State Park). In these wetlands, metal chain link fence posts will be installed in the wetland soil and the chain link fence and silt fence will be attached. Soil saturation or surface water is not anticipated to be a constraint during the installation of the fence.

The contractor will use a combination of equipment mats, super silt fence and straw wattles within the two large wetland crossings to minimize potential off-site disturbance during construction. Given the space constraints, the combination of these BMPs have been deemed the most effective option to minimize off-site transport of soil.

The following note has been added to the Construction Notes (#21) on Sheet D-190-36-G01 of the construction permit drawings: "Following the removal of the equipment mats and erosion controls, the Contractor will conduct final clean-up activities to reestablish the ground surface and drainage patterns within the easement to pre-construction conditions."

Comment 20.5.F. Storm Contingency Plans

Eversource's construction contractor and environmental inspector will monitor daily weather forecasts on a daily basis during construction to gain advanced warning of significant storm events that could

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result in surface flooding. Eversource will rely on the local NOAA National Weather Service forecasts and reports for up to date information¹. If severe weather is forecasted to likely generate flooding conditions in the immediate Project area, Eversource’s Contractor will backfill temporary soil stockpiles, check the fastening on the construction mats, and remove construction equipment from the easement to a secure upland location. Eversource will be able to conduct these storm preparation activities within one work day, once the decision is made to demobilize.

Comment 20.5.F. Back Up Pumps and Generators

During stream crossings, back-up pumps and generators will be stored on-site or at a nearby laydown area in proximity to the stream crossing work zone, so that replacement equipment is readily available in the event of a mechanical failure or need for additional pumping capacity.

Comment 20.5.H. Additional Stream Restoration Options

Additional stream bank restoration best management practices have been incorporated into the Project specifications for use by the construction contractor. Details have been included for the installation of dormant live staking and for the use of coir logs along restored stream banks. These details are shown on Sheet D-190-36-D12.

Comment 48. Stream Flow Determination.

As requested, a table has been prepared to identify the USGS Stream Stats results used to determine flow type of the streams crossed by the Project in accordance with 310 CMR 10.58(2)(a)1. Based on this analysis, two streams qualify as perennial including Cold Spring Brook (A17-8-PS1) and a tributary to Cold Spring Brook (A17-7-PS1). The other six streams crossed by the Project are intermittent given they have watershed areas less than 0.5 square miles in size.

Stream ID	Watershed Size (Square miles)	USGS/MassDEP Mapped Perennial	Predicted Flow Rate at 99% Flow Duration (cubic feet per second)	Percent of Watershed Underlain by Stratified Drift	Flow Determination
S-22	0.0145	No	N/A	0	Intermittent
S-21	0.0484	No	N/A	72%	Intermittent
S-7	0.08	No	N/A	3.33%	Intermittent
A17-7-PS1	0.93	No	0.0172	12.7%	Perennial
A17-8-PS2	0.0371	No	N/A	96.25%	Intermittent
A17-8-PS1 (Cold Spring)	6.48	Yes	0.307	39.9%	Perennial
A17-9-PS1	0.21	No	0.0045	23.83%	Intermittent
A17-10-IS1	0.0373	No	N/A	90.26	Intermittent

The reclassification of streams A17-8-PS2 and A17-9-PS1 as intermittent resulted in a reduction in Riverfront Area crossed by the Project. The Riverfront Area temporarily disturbed by the Project in Ashland has decreased by approximately 21,043 square feet. The new total Riverfront Area affected in

¹ <https://www.weather.gov/box/>

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Ashland is approximately 29,657 square feet. The construction permit plans have been updated to reflect this change and the StreamStat results are provided in Attachment 1.

Comment 47. Shape File

A shapefile will be provided identifying the scientific name of the mapped trees.

Lucas Section III Stormwater Review

Comment 1. Excess Soil

In the unlikely event excess soil is generated during construction, the contractor will place this material in upland sections of the easement outside of wetland resource areas including bordering vegetated wetlands, bank, land under water bodies and waterways, bordering land subject to flooding and riverfront area and the 100-foot buffer zone. The contractor may also store excess soil from the easement in an offsite laydown area outside of any jurisdictional resource areas.

Attachment A: Plans

The construction permit plans have been updated to address the following additional comments (see Attachment 2).

Comment A. General comments

A note has been added to the construction permit plans specifying the placement of annual rye in all areas that will be seeded with a wetland seed mix.

Comment B. Sheet 22

The existing bridge replacement note has been removed from Sheet 22.

Comment C. Sheet 23

The Bordering Land Subject to Flooding (BLSF) label on Sheet 23 has been revised.

Comment D. Sheet 27 and 27A

As requested, mean annual high water line labels have been added to the profile views of all stream crossings.

Comment E. Sheet 37A

As requested, a note has been added to Sheet 37A stating that the exposed pipe will be removed during construction of the new pipeline at this location.

Comment F. and Comment 43. Sheets D04A and D04B

The contractor will install the super silt fence into the ground adjacent to the equipment mats along the edges of the easement. The fence will be tall enough to extend above the mats. This will act as a barrier to soils temporarily stored on the mats during trench excavation. Depending on site conditions at the time of construction, the contractor may also fasten the super silt fence directly to the mat edges in

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addition to staking it in the ground to form a tighter seal with the mats. This additional measure will be implemented if it's determined to provide enhanced soil control at the time of construction. In all cases, the super silt fence will be installed into the ground adjacent to the equipment mats.

A note has been added to the super silt fence detail on Sheet D-190-36-D12 directing the contractor to fasten the super silt fence to the edge of the equipment mats at the time of construction if Eversource's Environmental Inspector determines that additional sediment control benefit will be realized by this additional measure.

As requested, Eversource has developed a new construction configuration showing a scenario where the existing pipeline is not located in the center of the permanent easement. This configuration shows an alternate placement of mats, equipment and spoil piles in the easement. This additional configuration is shown for a 20-foot wide easement and 30-foot wide easement on Sheets D-190-36-D04C and D04D.

Comment G. Sheet D05

Eversource has revised the stream crossing details shown on Sheet D05. They are now drawn to a scale of 1 inch = 6 feet and shown on individual sheets. The details are found on Sheets D05 (dam and pump), D05A (flume), and D05B (non-flowing stream).

Comment H. Sheet D06

The details shown on Sheet D06 have been revised to include a truck and dimensions.

Comment I. Sheet D11

Equipment mat Detail 3 on Sheet D11 has been revised with a note specifying the installation of the proposed erosion and sediment control measures for the Project including silt fence, super silt fence, straw bales and straw wattles. An additional note has been added to this detail stating that mats will be anchored as needed by lashing together with a cable or heavy rope and secured to a fixed object (e.g. trees).

Comment J. Sheet D12

Catch basin detail #4 on Sheet D12 has been removed. All catch basins will be protected as depicted in Detail #3 on Sheet D12.

Attachment B: Tree List

Comment A. Tree Survey Data

Tree Location #10 is in Hopkinton, not Ashland. The table has been updated accordingly to remove Location #10 (see Attachment 3 of this supplemental filing).

Comment B. Update tree survey table to identify trees in conservation commission jurisdiction including resource area type.

The tree survey data summary table has been revised to identify the trees located within the jurisdiction of the Ashland Conservation Commission. The applicable wetland resource areas and buffers have been identified for each data point in the table (see Attachment 3).

Trees potentially removed by the Project within jurisdictional wetland resource areas are within the existing, previously cleared and maintained utility easement. Given this, Eversource does not consider this a conversion of existing forested land to non-forested cover types, as it was previously established as a non-forested corridor for utility purposes and will continue to be maintained for that specific use in the future.

Attachment C. Invasive Species Control Plan

Comment A. and Comment 20.1. Invasive Species Details

The invasive species plan has been updated to include additional details on the target species identified during the Project surveys (see Attachment 4 of this supplemental filing). Plant fact sheets have been added to the Plan.

Comment B. Herbicide Use

If it has been determined through monitoring that invasive plant species have spread into portions of wetland resource areas not previously colonized by invasive species or colonized by different invasive species not previously identified in a wetland resource area, the Company will evaluate potential management measures. Management measures will consist of manual and/or mechanical methods to remove the plants. Invasive plant problems can often be eliminated by mechanical (non-chemical) methods provided the control measures are implemented early in the infestation stage. Manual and mechanical controls include hand pulling, digging, cutting, mowing, girdling, covering, and otherwise physically damaging plants and their habitats. Mechanical methods are generally preferred for smaller infestations because multiple, repeat efforts are generally required for success (Tu et al. 2001). For most species, it is crucial to remove every piece of the plant from the ground and off the site, as many invasive species can resprout from small fragments. For larger infestations, mowing may be helpful in preventing plants from reaching maturity or going to seed, but for some species, mowing may actually increase the growth rate.

If mechanical methods are not an effective option, Eversource will evaluate the potential use of an herbicide-based approach on a site-specific basis. For many species, such as common reed, chemical control or a combination of chemical and mechanical control may be the only effective management tactic. Herbicides can suppress and kill unwanted plants efficiently and effectively, though misuse can result in unintended consequences such as herbicide resistance, impacts to non-target organisms, soil and water contamination, and risks to human health. Common herbicides used for invasive species management include tryclopyr, imazapyr, and glyphosate. Herbicides may be applied through various techniques such as foliar spray, wicking, basal application (herbicide applied to bark with a penetrant), or cut-and-stump treatment. There are numerous regulations governing the use and application of

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herbicides in wetlands, and applicators must be licensed by the state in which the work is being performed. Eversource would obtain all necessary permits prior to the application of herbicides to control invasive plant species.

Comment C. Nurse Seed Mix

Annual rye has been added to Invasive Species Management Plan.

Section 3.2. Post-construction Monitoring.

Post-construction monitoring for invasive plant species will begin the year following the completion of construction of each of the four pipeline segments in Ashland. For example, the first pipe segment in Ashland is scheduled for completion in 2021, so monitoring for invasive species would occur in 2022 along this segment. Monitoring for each newly construction segment would begin the year following installation of that segment.

Comment D. Equipment Types

Eversource's Environmental Inspector will make every effort to ensure that prefabricated equipment mats, as well as construction equipment, are clean and free of excess dirt and mud prior to entering a wetland area that does not support infestations of common invasive species (e.g., common reed, purple loosestrife, etc.). Construction equipment includes both tracked backhoes and trucks accessing the easement.

Comment E. Vegetation Maintenance Plan

Following completion of the Project, Eversource will maintain the pipeline easement in a non-forested condition. This will be achieved through periodic mowing within the easement.

ATTACHMENT 1
Stream Stat Results

ATTACHMENT 2

Construction Permit Drawings

ATTACHMENT 3

Update Tree Survey Summary Table

ATTACHMENT 4

Invasive Plant Species Control Plan (Revised Dec. 2019)
