



ENVIRONMENTAL CONSULTANTS

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8 Science Park Road, 2nd Floor  
Scarborough, Maine 04074  
www.swca.com

January 13, 2020

Maeghan Dos Anjos, Conservation Agent/Director  
Town of Ashland  
101 Main Street  
Ashland, MA 01721

**Re: Response to Town Engineer Comments on Notice of Intent  
MassDEP File No. 95-0926**

Dear Ms. Dos Anjos:

SWCA Environmental Consultants (SWCA), on behalf of Eversource Energy, has prepared the enclosed response to the comments from Evan White, Ashland Town Engineer. The comments were provided via electronic mail to Eversource on December 9, 2019.

**Comment #18**

*Generally I agree with their comments on the timber matting. In regards to the floodwater storage impact due to the proposed work, I generally agree that the impacts will be minor, however the work proposed will likely result in a net loss of available floodwater storage and we have had flooding complaints due to pipeline work in wetland resource areas in the past. I would like to see these impacts studied further*

Eversource Response

As previously stated, the displacement of soil from the subsurface installation of the new pipe will have an insignificant effect on the land's ability to store flood waters and will result in no permanent impacts to the landscape and no above ground structures. Accordingly, the project, as proposed, is in compliance with the performance standards outlined in 310 CMR 10.55(4) of the Wetlands Protection Act and the Town of Ashland Wetlands Bylaw.

To further address the Commission's concern, Eversource performed an additional analysis of the floodplain to demonstrate that the proposed underground pipe installation will have a negligible impact on flood storage. This analysis assumes that the installation of an underground pipe could result in the loss of surface flood storage within the floodplain and is not a proposal for compensatory flood storage. Based on this analysis, Eversource looked at a 150-foot wide corridor centered on the proposed pipeline crossings of the two flood zones in Ashland. This corridor width was selected because Eversource had detailed contour information in this area. Using this study area, Eversource calculated the total surface flood storage capacity in the 150-foot wide area using the published FEMA flood elevations and the existing site grades and the total volume of the installed pipe in these two locations. Based on this, the percentage decrease is less than one percent of the total flood storage within the 150-foot wide area. This analysis did not factor in the partial offset that is likely through the removal of naturally occurring impervious material such as rocks and boulders from the trench that will not be put back following pipe installation. This analysis also did not consider subsurface volume as existing flood storage, which would further reduce the percentage change in flood storage.

Table 1: Comparison of Easement crossing (20-30 feet wide) of Floodplain

Location	Floodplain Station Start	Floodplain Station End	Total Linear Distance (ft)	Width of Area Analyzed (ft)*	Location Description	Estimated Flood Elevation per FEMA Data	Existing Flood Storage Capacity (yd <sup>3</sup> )	Volume of Proposed Pipe (yd <sup>3</sup> )	Net Flood Storage Capacity (yd <sup>3</sup> )	Percent Difference
1	102+86	109+19	633	20	Associated with Tributary to Cold Spring Brook. Limit begins approximately 400 ft east of West Union Street.	232'	424	20	404	-4.72%
2	127+80	139+42	1162	30	Associated with Cold Spring Brook. Limit begins approximately 100 ft east of Metropolitan Ave.	178'	3767	38	3729	-1.01%

Table 2: Comparison of 150-foot corridor crossing of Floodplain

Location	Floodplain Station Start	Floodplain Station End	Total Linear Distance (ft)	Width of Area Analyzed (ft)*	Location Description	Estimated Flood Elevation per FEMA Data	Existing Flood Storage Capacity (yd <sup>3</sup> )	Volume of Proposed Pipe (yd <sup>3</sup> )	Net Flood Storage Capacity (yd <sup>3</sup> )	Percent Difference
1	102+86	109+19	633	150	Associated with Tributary to Cold Spring Brook. Limit begins approximately 400 ft east of West Union Street.	232'	3,516	20	3,496	-0.57%
2	127+80	139+42	1162	150	Associated with Cold Spring Brook. Limit begins approximately 100 ft east of Metropolitan Ave.	178'	18,667	38	18,629	-0.20%

Looking at this from an even higher level, Eversource evaluated approximately 6.2 acres of the total Cold Spring Brook 100-year flood zone with its 150 feet wide corridor. The entire Cold Spring Brook mapped flood zone is approximately 304 acres in size. The 6.2 acres only makes up approximately 2.03 percent of the total Cold Spring Brook floodplain. Therefore, if the proposed pipe installation volumes are analyzed for the entire Cold Spring floodplain, the change in flood storage capacity becomes a drastically smaller percentage of the entire floodplain than what is reported in the table. Furthermore, this percentage would decrease even further if the existing flood storage is extended below the ground surface to the depth of the proposed pipe installation (three feet). Based on this assessment, the Project will not impact the land's ability to store flood waters.



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**Comment #34**

*In the event of a spill that enters the town's stormwater system, or wetland's system Conservation and the DPW should be notified.*

Eversource Response

Eversource commits to notifying the Ashland Conservation Commission and Department of Public Works in the event a spill enters the Town's stormwater system.

Please contact me at 207-520-4614 / [richard.paquette@swca.com](mailto:richard.paquette@swca.com) or Matt Waldrip at 781-441-8247 / [matthew.waldrip@eversource.com](mailto:matthew.waldrip@eversource.com) with any questions.

Sincerely,

A handwritten signature in black ink that reads "Richard C. Paquette, Jr." in a cursive script.

Richard C. Paquette, Jr.  
Senior Project Manager

cc: Matthew Waldrip, Eversource  
Sean Berthiaume, Eversource