



September 19, 2025

Ref: 73355.00

James Thorne
Project Manager
Green International Affiliates, Inc.
100 Ames Pond Drive
Tewksbury, MA 01876

Re: Stormwater Permit Peer Review
K137E/L138E ACR and 337 Rebuild
Littleton, Massachusetts

Applicant: New England Power Company
55 Bearfoot Rd
Northborough, MA 01532

Dear Mr. Thorne:

On behalf of the Applicant, VHB has received comments issued by the Green International Affiliates regarding the review of the Stormwater Management Report and Site Plan for the above-referenced project. We appreciate the effort associated with this review and offer the following responses. Green International Affiliates comments are presented below in *italics*, followed by VHB's responses in **bold** type.

1. *In general the access roads are called out as type 2 access road. The detail for type 2 show no swale adjacent to the road but the way the grading is shown on the plans a swale is created in various locations throughout the project. The rip rap limits aren't shown on the plans. Will the rip rap limits extend to the limit of grading? Consider adding check dams to slow channelized flow where swales are created as shown in type 1 detail.*

RESPONSE: Correct, most of the temporary gravel access roads in Littleton are classified as Type 2 and will be stabilized with erosion control barriers. The gravel limit will match the 12-foot road width. Road shoulders and any swales created by grading will be seeded where feasible, except in areas where steep slopes necessitate alternative stabilization measures.

2. *The silt sock/silt fence barrier should extend to station 0+25 on sheet C-104. Please revise to extend the full length of work.*

RESPONSE: Addressed. See Sheet C-104.

3. *The slope to existing on the southern edge of the work zone has a very steep slope. Please consider flattening the slope where feasible.*

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RESPONSE: The slope of the pad was flattened and slightly altered but VHB does note the pad grading is constrained by the existing easement and the parking lot to the south and railroad easement to the north. Reducing the pad size would compromise the safe placement of construction equipment and replacement of utility poles. The current side slope in this area is also 1:1, the project will match this existing condition. The contractor will reinforce the slope with riprap stone. A note was added to the plans.

4. *The southern edge of the work zone slopes down into existing but there is no erosion control downgradient of the work. Please provide erosion control measures downgradient of disturbance or explain why erosion control was omitted at this location.*

RESPONSE: Erosion control measures added downgradient of disturbance. See Sheet C-106.

5. *The silt sock/silt fence barrier should wrap into the edge of the grading at station 1+23 to protect the wetland from the sediment that will run down the slope between the barrier and the edge of grading. Please revise.*

RESPONSE: Addressed. See Sheet C-107.

6. *Provide silt sock/silt fence barrier along the eastern edge of the Blood Road to prevent sediment entering the roadway. A construction entrance should be provided due to the extensive regrading and hauling of excess soil. Please revise.*

RESPONSE: Stabilized construction exit location is now defined and silt sock/silt fence barrier provided along the eastern edge of Blood Road. See Sheet C-107.

7. *A silt sock/silt fence barrier should be provided along the downgradient side of the regrading for work pads 19-25 to contain the sediment within the grading area. Please revise.*

RESPONSE: Addressed. See Sheet C-108.

8. *The silt sock/silt fence barrier should extend to station 0+00 on Access Road K137E_29_A. Please revise to extend the full length of work.*

RESPONSE: Addressed. See Sheet C-109.

9. *Extend the silt sock/silt fence barrier east of Access Road K137E_30_A to the south to Access Road R to fully protect the wetland from earth disturbing activities from Access Road K137E_30_A. Please revise.*

RESPONSE: Addressed. See Sheet C-110.

10. *C-104 includes work within the Town of Ayer. C-111 includes work within the Town of Westford. The work within the Town of Westford and Town of Ayer was not reviewed.*

RESPONSE: Understood. Separate permitting submissions have been issued to those towns.

11. *We defer to the Conservation Commission for approval for the work performed in and near the environmentally sensitive areas like wetlands and vernal pools.*



RESPONSE: Noted.

12. *The narrative states that the access roads will be revegetated to match existing conditions and there will be no increase in impervious area. Water Quality and peak rate calculations have not been provided due to the project being restored to existing conditions. We are ok with this approach as long as the project is restored to existing conditions as stated in the narrative.*

RESPONSE: Noted.

13. *The narrative states the project will not discharge near or to a critical area. The project discharges to a vernal pool on C-104 which is considered a critical area. Please revise.*

RESPONSE: VHB has updated the Standard 6 section of the Stormwater Memorandum and the Stormwater checklist accordingly.

Thank you again for your time and consideration. We look forward to ongoing coordination of the proposed project with you as noted. If there are any additional questions/comments in the meantime, please feel free to contact me at evershinina@vhb.com or 617-607-2725.

Sincerely,

VHB

A handwritten signature in black ink, appearing to read "E. Vershinina", written in a cursive style.

Elena Vershinina, P.E.
Project Manager / Senior Civil Engineer