



To: Amit Urs
National Grid
170 Data Drive
Waltham, MA 02740

Date: 09/19/2025

Memorandum

Project #: 73355.00

From: Elena Vershinina, PE

Re: K137-L138, 337 Stormwater Memorandum

In accordance with the Massachusetts Stormwater Standards, this memorandum is provided by Vanasse Hangen Brustlin, Inc. (VHB) to outline the applicability and compliance of the New England Power Company's (NEP) K137E_L138E ACR and 337 Accessway Design Project (the Project). The Project, located in the towns of Ayer, Littleton, Westford, Chelmsford, Billerica and Tewksbury, MA, has been evaluated with respect to its location, scope of work, and nearby resource areas.

The K137E, L138E, and 337 transmission lines share the same right-of-way (ROW). NEP is proposing a complete replacement of all structures along the 337 line, as well as targeted refurbishment of structures on the K137 and L138 lines. The objective of this Project is to construct access routes to facilitate the refurbishment of structures along the 115kV K137E and L138E lines, and the 345kV 337 line, from Sandy Pond substation in Ayer, MA, to Tewksbury substation in Tewksbury, MA.

Access to the structures will primarily involve improving existing roads, constructing new gravel access to facilitate construction, or creating temporary access using timber mats. Graded, gravel work pads are proposed at each structure location, with an average size of 125 by 125 feet, adjusted as necessary to fit within the ROW. These access improvements and refurbishments are essential for re-establishing and maintaining access to the structures and work pads. In areas with sensitive environmental resources or receptors, temporary timber matting will be employed to minimize impact.

Please refer to the Environmental Resource Maps for a comprehensive overview of the existing access improvements and timber matting along the Project.

Erosion control barriers and swales with check dams will be introduced along steeper portions of the access routes to promote stormwater recharge through the proposed gravel areas, as well as through the surrounding undisturbed and vegetated sections within and around the ROW. The ROW is generally buffered by thick vegetation, which promotes the recharge of runoff into the groundwater and enhances water quality. The gravel access and pads at each structure will be revegetated, ensuring that any minor impacts to hydrology during the construction phase will be temporary.

The Project will also improve existing drainage conditions by introducing gradually sloped areas in locations with existing knolls and steep slopes. From an analytical perspective, these gradually sloped areas diminish flow velocities, increasing the time of concentration and, in turn, decreasing peak flows. Additionally, they promote infiltration while eliminating concentrated point discharges. While the overall impact will be temporary and considered de minimis, these grading enhancements, once revegetated, will result in improved hydraulic conditions compared to the pre-construction state.



Summary:

- › All work associated with ground disturbance for the Project is temporary in nature. Upon completion, all disturbed areas will be fully restored to their pre-existing vegetated conditions. The Project does not involve large-scale disturbance on any single parcel, rather, impacts are distributed linearly along the ROW. These areas are primarily located in remote settings, including wooded areas and agricultural fields, such as cornfields
- › The Project does not propose any permanent stormwater best management practices (BMPs) and does not require long-term maintenance
- › Erosion and sedimentation will be managed using appropriate BMPs, which will be implemented and actively monitored throughout the duration of construction to protect nearby wetlands and sensitive areas
- › Selective regrading will be conducted to improve local drainage conditions and reduce stormwater flow velocity
- › The Project supports local and regional electric reliability and serves the broader public interest
- › The Project's hydrologic impacts are less significant than those typically associated with an exempt four-lot residential subdivision. A typical residential lot ranges from approximately 40,000 to 60,000 square feet, with a combined impervious area for four lots generally totaling between 20,000 and 30,000 square feet. In comparison, the largest single area of disturbance associated with the Project, Structure 14 on Line 337, as shown on Drawing C-106, has an approximate disturbance footprint of 16,600 square feet.
- › The areas west of Blood Road (commonly referred to as the cornfields), shown on Drawings C-107 and C-108, contain three large mounds that will be removed as part of this Project. Timber mats will be utilized to minimize ground disturbance during construction. The new structures will be installed at the elevation of the surrounding fields, which will restore and provide additional land suitable for agricultural use.

Massachusetts Department of Environmental Protection (DEP) – Stormwater Management Standards

As demonstrated below, the proposed Project will have no permanent impact and therefore will comply with the DEP Stormwater Management Standards, as described below.

Standard 1: No New Untreated Discharges or Erosion to Wetlands

No new outfalls are proposed.

Standard 2: Peak Rate Attenuation

The proposed access improvements will have minimal impacts during construction. Erosion control barriers and vegetated lands within and surrounding the ROW will typically serve as buffers for the access areas ROW.

Ultimately, the Project will improve existing drainage conditions by introducing gradually sloped areas in locations with existing knolls and steep slopes. From an analytical perspective, these gradually sloped areas diminish flow velocities, increasing the time of concentration and, in turn, decrease peak flows. Additionally, they promote infiltration while eliminating concentrated point discharges. While the overall impact will be temporary and considered negligible, these grading enhancements, once revegetated, will result in improved hydraulic conditions compared to the pre-construction state.

The standard is met.

Standard 3: Stormwater Recharge

The Project is not proposing to construct any impervious surfaces. Erosion control barriers and swales with check dams along the steep access routes will promote stormwater recharge through the proposed semipervious gravel areas, as well as through the surrounding undisturbed and vegetated sections within and around the ROW. The ROW is generally buffered by thick vegetation, which promotes the recharge of runoff into the groundwater and enhances water quality. The overall impact is expected to be temporary and minimal, with no risk of inundating nearby neighborhoods.

The standard is met.

Standard 4: Water Quality

No permanent impervious surfaces are proposed. The gravel areas will be revegetated, leading to improved hydraulic conditions compared to the pre-construction state. Standard 4 is met.

Standard 5: Land Uses with Higher Potential Pollutant Loads (LUHPPLs)

The Project is not considered a LUHPPL, therefore Standard 5 is met.

Standard 6: Critical Areas

The work area at Access Road 11_K137E indirectly discharges stormwater to a vernal pool, which is a critical area. The temporary gravel condition is semi-impervious, allowing for infiltration, which provide Total Suspended Solids and Total Phosphorous reduction. Silt sock and silt fences will be established along the limit of disturbance to provide

erosion and sedimentation controls along the edge of the access road, providing a buffer between the disturbed area and the vernal pool. The area will be fully restored following construction.

The standard is met.

Standard 7: Redevelopments and Other Projects Subject to the Standards only to the Maximum Extent Practicable

N/A.

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Controls

The Project will be required to obtain coverage under the Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) Construction General Permit. As required under this permit, a Stormwater Pollution Prevention Plan (SWPPP) will be developed by the Site Operator and submitted before land disturbance begins.

During construction, NEP will implement stormwater best management practices (BMPs), including sediment and erosion controls. As a result, Standard 8 is satisfied.

Standard 9: Operation and Maintenance Plan

No new stormwater management systems requiring long-term operation and maintenance will be proposed for this Project. Therefore, Standard 9 is not applicable.

Standard 10: Prohibition of Illicit Discharges

No Illicit Discharge Compliance Statement is attached but will be submitted prior to the discharge of any stormwater to post-construction BMPs. (Language per MA Stormwater Report Checklist).



Checklist for Stormwater Report

A. Introduction

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.



A Stormwater Report must be submitted with the Notice of Intent permit application to document compliance with the Stormwater Management Standards. The following checklist is NOT a substitute for the Stormwater Report (which should provide more substantive and detailed information) but is offered here as a tool to help the applicant organize their Stormwater Management documentation for their Report and for the reviewer to assess this information in a consistent format. As noted in the Checklist, the Stormwater Report must contain the engineering computations and supporting information set forth in Volume 3 of the [Massachusetts Stormwater Handbook](#). The Stormwater Report must be prepared and certified by a Registered Professional Engineer (RPE) licensed in the Commonwealth.

The Stormwater Report must include:

- The Stormwater Checklist completed and stamped by a Registered Professional Engineer (see page 2) that certifies that the Stormwater Report contains all required submittals.¹ This Checklist is to be used as the cover for the completed Stormwater Report.
- Applicant/Project Name
- Project Address
- Name of Firm and Registered Professional Engineer that prepared the Report
- Long-Term Pollution Prevention Plan required by Standards 4-6
- Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan required by Standard 8²
- Operation and Maintenance Plan required by Standard 9

In addition to all plans and supporting information, the Stormwater Report must include a brief narrative describing stormwater management practices, including environmentally sensitive site design and LID techniques, along with a diagram depicting runoff through the proposed BMP treatment train. Plans are required to show existing and proposed conditions, identify all wetland resource areas, NRCS soil types, critical areas, Land Uses with Higher Potential Pollutant Loads (LUHPPL), and any areas on the site where infiltration rate is greater than 2.4 inches per hour. The Plans shall identify the drainage areas for both existing and proposed conditions at a scale that enables verification of supporting calculations.

As noted in the Checklist, the Stormwater Management Report shall document compliance with each of the Stormwater Management Standards as provided in the Massachusetts Stormwater Handbook. The soils evaluation and calculations shall be done using the methodologies set forth in Volume 3 of the Massachusetts Stormwater Handbook.

To ensure that the Stormwater Report is complete, applicants are required to fill in the Stormwater Report Checklist by checking the box to indicate that the specified information has been included in the Stormwater Report. If any of the information specified in the checklist has not been submitted, the applicant must provide an explanation. The completed Stormwater Report Checklist and Certification must be submitted with the Stormwater Report.

¹ The Stormwater Report may also include the Illicit Discharge Compliance Statement required by Standard 10. If not included in the Stormwater Report, the Illicit Discharge Compliance Statement must be submitted prior to the discharge of stormwater runoff to the post-construction best management practices.

² For some complex projects, it may not be possible to include the Construction Period Erosion and Sedimentation Control Plan in the Stormwater Report. In that event, the issuing authority has the discretion to issue an Order of Conditions that approves the project and includes a condition requiring the proponent to submit the Construction Period Erosion and Sedimentation Control Plan before commencing any land disturbance activity on the site.



Checklist for Stormwater Report

B. Stormwater Checklist and Certification

The following checklist is intended to serve as a guide for applicants as to the elements that ordinarily need to be addressed in a complete Stormwater Report. The checklist is also intended to provide conservation commissions and other reviewing authorities with a summary of the components necessary for a comprehensive Stormwater Report that addresses the ten Stormwater Standards.

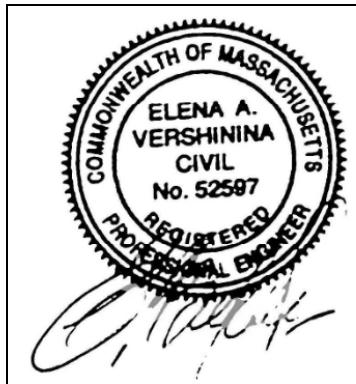
Note: Because stormwater requirements vary from project to project, it is possible that a complete Stormwater Report may not include information on some of the subjects specified in the Checklist. If it is determined that a specific item does not apply to the project under review, please note that the item is not applicable (N.A.) and provide the reasons for that determination.

A complete checklist must include the Certification set forth below signed by the Registered Professional Engineer who prepared the Stormwater Report.

Registered Professional Engineer's Certification

I have reviewed the Stormwater Report, including the soil evaluation, computations, Long-term Pollution Prevention Plan, the Construction Period Erosion and Sedimentation Control Plan (if included), the Long-term Post-Construction Operation and Maintenance Plan, the Illicit Discharge Compliance Statement (if included) and the plans showing the stormwater management system, and have determined that they have been prepared in accordance with the requirements of the Stormwater Management Standards as further elaborated by the Massachusetts Stormwater Handbook. I have also determined that the information presented in the Stormwater Checklist is accurate and that the information presented in the Stormwater Report accurately reflects conditions at the site as of the date of this permit application.

Registered Professional Engineer Block and Signature



9/19/2025

Signature and Date

Checklist

Project Type: Is the application for new development, redevelopment, or a mix of new and redevelopment?

- New development
- Redevelopment
- Mix of New Development and Redevelopment



Checklist for Stormwater Report

Checklist (continued)

LID Measures: Stormwater Standards require LID measures to be considered. Document what environmentally sensitive design and LID Techniques were considered during the planning and design of the project:

- No disturbance to any Wetland Resource Areas
- Site Design Practices (e.g. clustered development, reduced frontage setbacks)
- Reduced Impervious Area (Redevelopment Only)
- Minimizing disturbance to existing trees and shrubs
- LID Site Design Credit Requested:
 - Credit 1
 - Credit 2
 - Credit 3
- Use of "country drainage" versus curb and gutter conveyance and pipe
- Bioretention Cells (includes Rain Gardens)
- Constructed Stormwater Wetlands (includes Gravel Wetlands designs)
- Treebox Filter
- Water Quality Swale
- Grass Channel
- Green Roof
- Other (describe): _____

Standard 1: No New Untreated Discharges

- No new untreated discharges
- Outlets have been designed so there is no erosion or scour to wetlands and waters of the Commonwealth
- Supporting calculations specified in Volume 3 of the Massachusetts Stormwater Handbook included.



Checklist for Stormwater Report

Checklist (continued)

Standard 2: Peak Rate Attenuation

- Standard 2 waiver requested because the project is located in land subject to coastal storm flowage and stormwater discharge is to a wetland subject to coastal flooding.
- Evaluation provided to determine whether off-site flooding increases during the 100-year 24-hour storm.
- Calculations provided to show that post-development peak discharge rates do not exceed pre-development rates for the 2-year and 10-year 24-hour storms. If evaluation shows that off-site flooding increases during the 100-year 24-hour storm, calculations are also provided to show that post-development peak discharge rates do not exceed pre-development rates for the 100-year 24-hour storm.

Standard 3: Recharge

- Soil Analysis provided.
- Required Recharge Volume calculation provided.
- Required Recharge volume reduced through use of the LID site Design Credits.
- Sizing the infiltration, BMPs is based on the following method: Check the method used.
 - Static
 - Simple Dynamic
 - Dynamic Field¹
- Runoff from all impervious areas at the site discharging to the infiltration BMP.
- Runoff from all impervious areas at the site is *not* discharging to the infiltration BMP and calculations are provided showing that the drainage area contributing runoff to the infiltration BMPs is sufficient to generate the required recharge volume.
- Recharge BMPs have been sized to infiltrate the Required Recharge Volume.
- Recharge BMPs have been sized to infiltrate the Required Recharge Volume *only* to the maximum extent practicable for the following reason:
 - Site is comprised solely of C and D soils and/or bedrock at the land surface
 - M.G.L. c. 21E sites pursuant to 310 CMR 40.0000
 - Solid Waste Landfill pursuant to 310 CMR 19.000
 - Project is otherwise subject to Stormwater Management Standards only to the maximum extent practicable.
- Calculations showing that the infiltration BMPs will drain in 72 hours are provided.
- Property includes a M.G.L. c. 21E site or a solid waste landfill and a mounding analysis is included.

¹ 80% TSS removal is required prior to discharge to infiltration BMP if Dynamic Field method is used.



Checklist for Stormwater Report

Checklist (continued)

Standard 3: Recharge (continued)

- The infiltration BMP is used to attenuate peak flows during storms greater than or equal to the 10-year 24-hour storm and separation to seasonal high groundwater is less than 4 feet and a mounding analysis is provided.
- Documentation is provided showing that infiltration BMPs do not adversely impact nearby wetland resource areas.

Standard 4: Water Quality

The Long-Term Pollution Prevention Plan typically includes the following:

- Good housekeeping practices;
- Provisions for storing materials and waste products inside or under cover;
- Vehicle washing controls;
- Requirements for routine inspections and maintenance of stormwater BMPs;
- Spill prevention and response plans;
- Provisions for maintenance of lawns, gardens, and other landscaped areas;
- Requirements for storage and use of fertilizers, herbicides, and pesticides;
- Pet waste management provisions;
- Provisions for operation and management of septic systems;
- Provisions for solid waste management;
- Snow disposal and plowing plans relative to Wetland Resource Areas;
- Winter Road Salt and/or Sand Use and Storage restrictions;
- Street sweeping schedules;
- Provisions for prevention of illicit discharges to the stormwater management system;
- Documentation that Stormwater BMPs are designed to provide for shutdown and containment in the event of a spill or discharges to or near critical areas or from LUHPPL;
- Training for staff or personnel involved with implementing Long-Term Pollution Prevention Plan;
- List of Emergency contacts for implementing Long-Term Pollution Prevention Plan.

- A Long-Term Pollution Prevention Plan is attached to Stormwater Report and is included as an attachment to the Wetlands Notice of Intent.
- Treatment BMPs subject to the 44% TSS removal pretreatment requirement and the one inch rule for calculating the water quality volume are included, and discharge:
 - is within the Zone II or Interim Wellhead Protection Area
 - is near or to other critical areas
 - is within soils with a rapid infiltration rate (greater than 2.4 inches per hour)
 - involves runoff from land uses with higher potential pollutant loads.
- The Required Water Quality Volume is reduced through use of the LID site Design Credits.
- Calculations documenting that the treatment train meets the 80% TSS removal requirement and, if applicable, the 44% TSS removal pretreatment requirement, are provided.



Checklist for Stormwater Report

Checklist (continued)

Standard 4: Water Quality (continued)

- The BMP is sized (and calculations provided) based on:
 - The ½" or 1" Water Quality Volume or
 - The equivalent flow rate associated with the Water Quality Volume and documentation is provided showing that the BMP treats the required water quality volume.
- The applicant proposes to use proprietary BMPs, and documentation supporting use of proprietary BMP and proposed TSS removal rate is provided. This documentation may be in the form of the proprietary BMP checklist found in Volume 2, Chapter 4 of the Massachusetts Stormwater Handbook and submitting copies of the TARP Report, STEP Report, and/or other third party studies verifying performance of the proprietary BMPs.
- A TMDL exists that indicates a need to reduce pollutants other than TSS and documentation showing that the BMPs selected are consistent with the TMDL is provided.

Standard 5: Land Uses With Higher Potential Pollutant Loads (LUHPPLs)

- The NPDES Multi-Sector General Permit covers the land use and the Stormwater Pollution Prevention Plan (SWPPP) has been included with the Stormwater Report.
- The NPDES Multi-Sector General Permit covers the land use and the SWPPP will be submitted **prior to** the discharge of stormwater to the post-construction stormwater BMPs.
- The NPDES Multi-Sector General Permit does **not** cover the land use.
- LUHPPLs are located at the site and industry specific source control and pollution prevention measures have been proposed to reduce or eliminate the exposure of LUHPPLs to rain, snow, snow melt and runoff, and been included in the long term Pollution Prevention Plan.
- All exposure has been eliminated.
- All exposure has **not** been eliminated and all BMPs selected are on MassDEP LUHPPL list.
- The LUHPPL has the potential to generate runoff with moderate to higher concentrations of oil and grease (e.g. all parking lots with >1000 vehicle trips per day) and the treatment train includes an oil grit separator, a filtering bioretention area, a sand filter or equivalent.

Standard 6: Critical Areas

- The discharge is near or to a critical area and the treatment train includes only BMPs that MassDEP has approved for stormwater discharges to or near that particular class of critical area.
- Critical areas and BMPs are identified in the Stormwater Report.



Checklist for Stormwater Report

Checklist (continued)

Standard 7: Redevelopments and Other Projects Subject to the Standards only to the maximum extent practicable

The project is subject to the Stormwater Management Standards only to the maximum Extent Practicable as a:

- Limited Project
- Small Residential Projects: 5-9 single family houses or 5-9 units in a multi-family development provided there is no discharge that may potentially affect a critical area.
- Small Residential Projects: 2-4 single family houses or 2-4 units in a multi-family development with a discharge to a critical area
- Marina and/or boatyard provided the hull painting, service and maintenance areas are protected from exposure to rain, snow, snow melt and runoff
- Bike Path and/or Foot Path
- Redevelopment Project
- Redevelopment portion of mix of new and redevelopment.

Certain standards are not fully met (Standard No. 1, 8, 9, and 10 must always be fully met) and an explanation of why these standards are not met is contained in the Stormwater Report.

The project involves redevelopment and a description of all measures that have been taken to improve existing conditions is provided in the Stormwater Report. The redevelopment checklist found in Volume 2 Chapter 3 of the Massachusetts Stormwater Handbook may be used to document that the proposed stormwater management system (a) complies with Standards 2, 3 and the pretreatment and structural BMP requirements of Standards 4-6 to the maximum extent practicable and (b) improves existing conditions.

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control

A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan must include the following information:

- Narrative;
- Construction Period Operation and Maintenance Plan;
- Names of Persons or Entity Responsible for Plan Compliance;
- Construction Period Pollution Prevention Measures;
- Erosion and Sedimentation Control Plan Drawings;
- Detail drawings and specifications for erosion control BMPs, including sizing calculations;
- Vegetation Planning;
- Site Development Plan;
- Construction Sequencing Plan;
- Sequencing of Erosion and Sedimentation Controls;
- Operation and Maintenance of Erosion and Sedimentation Controls;
- Inspection Schedule;
- Maintenance Schedule;
- Inspection and Maintenance Log Form.

A Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan containing the information set forth above has been included in the Stormwater Report.



Checklist for Stormwater Report

Checklist (continued)

Standard 8: Construction Period Pollution Prevention and Erosion and Sedimentation Control (continued)

- The project is highly complex and information is included in the Stormwater Report that explains why it is not possible to submit the Construction Period Pollution Prevention and Erosion and Sedimentation Control Plan with the application. A Construction Period Pollution Prevention and Erosion and Sedimentation Control has **not** been included in the Stormwater Report but will be submitted **before** land disturbance begins.
- The project is **not** covered by a NPDES Construction General Permit.
- The project is covered by a NPDES Construction General Permit and a copy of the SWPPP is in the Stormwater Report.
- The project is covered by a NPDES Construction General Permit but no SWPPP been submitted. The SWPPP will be submitted BEFORE land disturbance begins.

Standard 9: Operation and Maintenance Plan

- The Post Construction Operation and Maintenance Plan is included in the Stormwater Report and includes the following information:
 - Name of the stormwater management system owners;
 - Party responsible for operation and maintenance;
 - Schedule for implementation of routine and non-routine maintenance tasks;
 - Plan showing the location of all stormwater BMPs maintenance access areas;
 - Description and delineation of public safety features;
 - Estimated operation and maintenance budget; and
 - Operation and Maintenance Log Form.
- The responsible party is **not** the owner of the parcel where the BMP is located and the Stormwater Report includes the following submissions:
 - A copy of the legal instrument (deed, homeowner's association, utility trust or other legal entity) that establishes the terms of and legal responsibility for the operation and maintenance of the project site stormwater BMPs;
 - A plan and easement deed that allows site access for the legal entity to operate and maintain BMP functions.

Standard 10: Prohibition of Illicit Discharges

- The Long-Term Pollution Prevention Plan includes measures to prevent illicit discharges;
- An Illicit Discharge Compliance Statement is attached;
- NO Illicit Discharge Compliance Statement is attached but will be submitted **prior to** the discharge of any stormwater to post-construction BMPs.