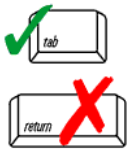
Massachusetts Department of Environmental Protection
Bureau of Resource Protection - Wetlands Program

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 8[2]
- 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.

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[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.

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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

05/06/2025
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 Field[1]

☐ 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.

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[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 propriety 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.

BSC GROUP

MEMORANDUM

803 SUMMER STREET, BOSTON, MA 02127 - www.bscgroup.com

TEL 617-896-4300

To:	Andrew Cole, National Grid	**Date:**	August 20, 2025
From:	Bryan Wentworth, P.E.	**Proj. No.**	0101660.00
Re:	394 Transmission Line and B154/C155 King Street Tap Line ACR Project – Stormwater Report		

Pursuant to the Massachusetts Stormwater Standards, BSC Group, Inc. (BSC) is providing this memorandum detailing the applicability and compliance with the Standards given the Project location, scope of work, and proximal resource areas related to the New England Power Company's (NEP) 394 Transmission Line and B154/C155 King Street Tap Line Asset Conditions Refurbishment (ACR) Project located in the Towns of Amesbury, Boxford, Georgetown, Groveland, Haverhill, Merrimac, and West Newbury, Massachusetts..

NEP is proposing a refurbishment of the 345 kilovolt (kV) 394 Transmission Line and the 115 kV B154/C155 King Street Tap Lines (the Tap Lines), referred to as the 394 Transmission Line and B154/C155 King Street Tap Lines Asset Condition Refurbishment (ACR) Project (the Project). The Lines are located within an existing Right-of-Way (ROW) corridor which begins at Ward Hill Substation in Haverhill and runs through the towns of Boxford, Groveland, Georgetown, West Newbury, Merrimack, and Amesbury, Massachusetts before transitioning ownership to Eversource at the Massachusetts/New Hampshire state line in Amesbury. The total length of the Lines, including the B154/C155 King Street Tap Lines, which is collocated with the 394 Line, is approximately 17.1 miles.

NEP has identified physical issues in many structures on the Lines, contributing to the Lines' poor performance. Inspections revealed that 83 wood structures on the 394 Line ranged from fair to poor condition, and over 100 wood structures on the C154/B155 King Street Tap Lines had woodpecker damage, pole top rot, cracked crossarms, splitting poles, and other decay. Affected King Street Tap Line structures also average 30 years of age and are reaching the end of the typical useful life for natural wood structures. The affected assets must be replaced to allow NEP to continue to meet regional demands for a reliable supply of electricity and improve asset resiliency in the future. Proposed Project activities will involve the refurbishment of the Lines to address the poor asset condition, mitigate potential risks of electrical failure, and will provide long-term reliable delivery of electrical service and maintenance of the Lines.

Activities will include the removal of existing wooden structures (varying types) to be replaced with steel structures (varying types); upgrading foundations for various structures (including converting from direct embed to caisson or special foundation); the replacement of existing shield wire with OPGW; replacement of conductor hardware; reconductoring of the Tap Lines; the construction and improvement of access and work areas, including grading and the addition of stone to access roads and graded work pads centered on the structure for future maintenance work access.

NEP is proposing to improve or re-establish access throughout the ROW. Where existing access is in generally good condition, these areas will not require significant grading or excavation, and improvements will consist of leveling/smoothing existing rutting and top dressing with gravel. In areas where historic access has deteriorated to a state which is insufficient to support the reconstruction of the Lines, access improvements will consist of minor grading activities, vegetation management, and placement of imported gravel. NEP will perform access construction in compliance with the conditions and approvals of the appropriate federal, state, and local regulatory agencies. As needed based on site conditions, NEP crews will use water for dust suppression during road construction. Crews will install clean stone aprons at construction entrances to the ROW to reduce sediment tracking into public roadways.

The associated maintenance and re-establishment of access roads and work areas along the Lines will not have a significant impact on the overall hydrology of the watersheds along the Project ROW. The addition of gravel access alignments and work areas is similar in nature, from a hydrologic perspective, to the development of single-family detached dwellings, which are exempt from compliance with the Stormwater Standards. BSC has conducted hydrological modeling of several example watersheds along similar transmission line ROWs to evaluate the changes to peak discharge rates from the work but has not modeled this Project specifically. Access and work areas are generally buffered by densely vegetated land which promotes recharge of runoff back to groundwater and protection of water quality. Gravel work pads

constructed to support structure replacement will be allowed to passively revegetate over time; therefore, the minor impact to hydrology will diminish further over time. Areas that will be impacted temporarily (e.g., mowed access and work areas, access for OPGW underslung wire rope pulling, or matted access and work areas) will be loamed and seeded following construction to promote active revegetation or will be topped with straw to protect soils (if alternative restoration is required under other permits), ruts will be filled, and changes to grade will be restored where needed.

The Project will comply with the applicable Massachusetts Stormwater Management Standards to the maximum extent practicable and will be subject to the standards and conditions of the NPDES Stormwater Construction General Permit ("CGP"). The project will not have a significant impact on hydrology along the ROW. By controlling the run-on to and runoff from the constructed access and work areas and allowing that stormwater to recharge into the ROW ground surface in a controlled manner, the Project is meeting the intent of the Massachusetts Stormwater Handbook and the provisions of 310 CMR 10.05(6)(k) through (q).

The potential for impacts from stormwater along the ROW will be associated with the potential for erosion and/or washout of the gravel access during and following construction. NEP will employ construction-phase BMPs for stormwater management including sediment and erosion controls. Additionally, during the construction of the Project, NEP's contractor will evaluate the need to construct stormwater management features such as swales, water bars, plunge pools, and/or check dams to promote stability of the constructed access improvements, reduce the potential for significant erosion and/or washout, and protect sensitive resource areas. These features will be further evaluated during construction to consider site-specific constraints and/or drainage patterns.

NEP notes that the roughly 1,353 square feet (SF) of impervious area proposed by the concrete caissons is spread along 17.1 miles and 426 acres of ROW. An individual concrete caisson occupies approximately 50 SF. Runoff associated with the additional impervious surfaces in each watershed will be negligible and does not warrant specific measures for removal of total suspended solids (TSS). Runoff from the concrete caissons and surrounding access is also generally buffered by shrubby and/or forested vegetation where recharge will occur naturally.

In accordance with the requirements of 310 CMR 10.05, the following summarizes how the Project meets the Massachusetts Stormwater Standards to the maximum extent practicable.

Standard 1: No new stormwater conveyances (e.g. outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.

> No new outfalls are proposed as part of the Project. By controlling the run-on to and runoff from the constructed access and work areas and allowing that stormwater to recharge into the ROW ground surface in a controlled manner, the Project will prevent erosion and sedimentation to wetlands or waters of the Commonwealth.

Standard 2: Stormwater management systems shall be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates. This Standard may be waived for discharges to land subject to coastal storm flowage as defined in 310 CMR 10.04.

> The access improvements proposed will result in minimal impacts on post-development peak discharge rates and the proposed access and work areas will typically be buffered by densely vegetated lands within and surrounding the utility ROW.
>
> As detailed in the narrative above, NEP has conducted assessments to evaluate construction of gravel access, and 1,353 SF of impervious surfaces due to installation of concrete caissons to replace existing structure foundations. By allowing the gravel work areas to revegetate over time, the minimal impact to hydrology will be further reduced. As the additional impervious area added by concrete caissons is spread over exceptionally large areas with each caisson consisting of a very small area, this will not result in an increase in peak flow rates from the Project.

Standard 3: Loss of annual recharge to groundwater shall be eliminated or minimized through the use of infiltration measures including environmentally sensitive site design, low impact development techniques, stormwater best management practices, and good operation and maintenance. At a minimum, the annual recharge from the post-development site shall approximate the annual recharge from pre-development conditions based on soil type. This Standard is met when the stormwater management system is designed to infiltrate the required recharge volume as determined in accordance with the Massachusetts Stormwater Handbook.

While gravel work areas beneath structures on graded pads and improvements to access alignments will change cover type within the ROW, stormwater will still be able to recharge through the proposed gravel areas and within the surrounding undisturbed and vegetated areas within the ROW. The total area that will be occupied by proposed concrete caisson foundations will consist of a small amount of impervious area spread out over a very large area along the ROW. Therefore, the proposed work will not result in a loss to annual recharge for the ROW or surrounding areas.

Standard 4: *Stormwater management systems shall be designed to remove 80% of the average annual post-construction load of Total Suspended Solids (TSS). This Standard is met when:*

a. Suitable practices for source control and pollution prevention are identified in a long-term pollution prevention plan, and thereafter are implemented and maintained;

b. Structural stormwater best management practices are sized to capture the required water quality volume determined in accordance with the Massachusetts Stormwater Handbook; and

c. Pretreatment is provided in accordance with the Massachusetts Stormwater Handbook.

The proposed construction of gravel access and work areas, and *de minimis* impervious area will not generate the pollutant loading typical of commercial and industrial development. As such, a long-term pollution prevention plan is not warranted. The construction of stormwater management features such as swales, water bars, plunge pools, and/or check dams will promote stability of the constructed access improvements, reducing the potential for significant erosion and/or washout, and protecting sensitive resource areas. As each concrete caisson is approximately 50 SF, runoff associated with the additional impervious surfaces in each watershed will be negligible and does not warrant specific measures for removal of TSS.

Standard 5: For land uses with higher potential pollutant loads, source control and pollution prevention shall be implemented in accordance with the Massachusetts Stormwater Handbook to eliminate or reduce the discharge of stormwater runoff from such land uses to the maximum extent practicable.

This site is not considered a land use with higher potential pollutant loads (LUHPPL), therefore, Standard 5 does not apply.

Standard 6: Stormwater discharges within the Zone II or Interim Wellhead Protection Area of a public water supply, and stormwater discharges near or to any other critical area, require the use of the specific source control and pollution prevention measures and the specific structural stormwater best management practices determined by the Department to be suitable for managing discharges to such areas, as provided in the Massachusetts Stormwater Handbook

While portions of the Project include areas which are associated with Outstanding Resource Waters or public water supplies, no impervious surfaces are proposed which would require stormwater treatment and no new stormwater discharges are proposed in these locations.

Standard 7: A redevelopment project is required to meet the following Stormwater Management Standards only to the maximum extent practicable: Standard 2, Standard 3, and the pretreatment and structural best management practice requirements of Standards 4, 5, and 6.

The project is not a redevelopment, therefore Standard 7 does not apply.

Standard 8: A plan to control construction-related impacts including erosion, sedimentation and other pollutant sources during construction and land disturbance activities (construction period erosion, sedimentation, and pollution prevention plan) shall be developed and implemented.

As construction will disturb more than one acre of land, coverage under the EPA's NPDES CGP is required. NEP will submit a Notice of Intent (NOI) and prepare a Stormwater Pollution Prevention Plan (SWPPP) for the Project. During construction, NEP will employ stormwater BMPs, including sediment and erosion controls.

Standard 9: A long-term operation and maintenance plan shall be developed and implemented to ensure that stormwater management systems function as designed.

No new stormwater management systems will be proposed that require long-term operation and maintenance for this project. Standard 9 is not applicable.

Standard 10: All illicit discharges to the stormwater management system are prohibited.

There are no known illicit discharges from the Project area and no new illicit discharges will be created.